

SFUND RECORDS CTR 88004099

PRELIMINARY ASSESSMENT Region 9

Date 1-14-83

SFUND RECORDS CTR

50930

Preparer's Name PATTY COOK

		SOURCE	INFORMATION
1.	Site ID Number	ERLISDATA	AZ D043848993
2.	Site Name	17	FOREMOSTMCKESSON-MCKESSON
3.	Site Location	. u	CHEMICAL CO. 4909 W. PASADENA AVE. GLENDALEAZ
4.	County	','	MARICOPA
5.	Owner (Address & telephone no.)	RCRA Notification Duted 11-19-80	FOREMOST MCKESSON INC. SAME AG3 ABOVE
5.	Operator (Address & telephone no.)	/'	TILL J. NEVILLE 4909 WEST. PASADENA AVE. GLENDALE, AZ. (602) 934-3281
7.	Type of Ownership	h	PRIVATE
8.	Status	6	ACTIVE
9.	Source Activity	RCRA Notification Dated 11/19/80	DISTRIBUTOR OF ORGANIC, INORGANIC CHEMICALS, USED TO STORE DRUMMED WASTES ON SITE TO ACCUMULATE FULL TRUCKLOADS. OPERATES AN ELEMENT NEUTRALIDATION UNIT TO TREAT WASTES
0.	Years of Operation	11	17 YEARS TO DISCHARGE TO
1.	Facility Type	"	GENERATOR TREATMENT, Drums and pits
2.	Waste Type and Description	11:	DOO2" - corrosive solid waste treated in noutralization pits and discharged to sewer
			tetrachloroethylene carbon tetrac methylene chloride, chlorobenzene trichloroflyromethane, cresols, cresylic acid, toluene, methyl ethy Ketone, carbon disuffide, pyridir
			Ketone, carbon disuffice. Dyriding

EPA-IX-FORM 890

cyanide salts in drums to recycler (do not store these on site now).

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	BILL CRUM, ASST. REGIONALOPER ATIONS JANAGER, MCKESSON CHEM.
13.	TILL IT NEVILLE BRANCH MANAGER, MCKESSON CHEMICAL CO.
	ALAN L. ROESLER, BUREAU OF WASTE CONTROL (602) 934-3281 AZ. DOHS (602) 265-1166
· · ·	TALBERT EISENBERG (602) 255-1460, 4045
Pore	Incidents NONE
fire	Coplosion: low
Dir	ect contact: low
15.	Inspections (date, type, by whom, recommendations) *JOHN GOMEZ, AZDOHS, Z-17-BZ, FACILITY MEETS OR EXCEEDS STANDARDS WITH PEW MINOR EXCEPTIONS, NO EVIDENCE OF SPILLS, FACILITY OBSERVES ALL SAFETY, MAINTENANCE SECURITY, EMERGENCY, etc. REQUIREMENTS (SCL ENCLOSED INSPECTION REPORT). • DISCHARGE TO SANITARY SEWER IS APPROVED BY CITY OF GLENDALE (SCL RCRA application).
16.	Enforcement History (list date, type of action, requirements, outcome)
	THER! ALAN ROESLER, AZDOHS, CURRENTLY INVOLVED IN NEGOTIATING MCKESSON (HEM. CO'S REQUEST FOR EXEMPTION/WITHDRAWAL OF RCRA PART A/PART B PERMIT APPLICATION. ON-GOING MON FOR PROGRAM BY POREMOST MCKESSON TO DETERMINE PH OF TREATMENT PIT-IT IS EXPECTED TO BE WITHIN THE RANGE OF 2-12.5 AND WILL THEREFORE BE CONSIDERED NON-HAZARDOUS UNDER RCRA. Initial recommendation for further action: INTERIM STATUS STANDARD
	· · · · · · · · · · · · · · · · · · ·
	BASED ON INFO. CONTAINED IN THIS FILE, NO PURTHER ACTION IS REQUI
17.b.	EPA recommendation for further action: No further action.
•	· · · · · · · · · · · · · · · · · · ·
18.	Response Termination: Y No Further Action Pending Active
	Justification: There is no widence of on-site
dis	posal of haz. waste. Paula Bisson 6-28-83
•	

		SOURCE	INFORMATION
19.	Observed Release		
20.	Depth to Aquifer		
21.	Net Precipitation		
	Net seas. rainfall		
-	Evaporation		
22.	Permeability of Unsaturated Zone		
23.	Physical State		ī
24.	Containment (Ground Water)		
25.	Toxicity		
26.	Persistence		
27.	Waste Quantity	-	
28.	Ground Water Use		
29.	Distance to Well		
30.	Population Served (by Ground Water)		

		SOURCE	INFORMATION
31.	Facility Slope		
32.	l yr. 24 hr. rainfall		
33.	Distance to Surface Water		
34.	Containment (Surface Water)		
35.	Surface Water Use		-
36.	Distance to Sensi- tive Environment		
37.	Population Served (by Surface Water)		
38.	Distance to Water Intake		
39.	Reactivity		
40.	Incompatibility		,
41.	Toxicity (Air)		
42.	Population within 4 mile radius		
43.	Land Use		

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5. It this same as # 3 above? (ES Corporate Beadquarters? Address + plane & needed,
Corporate Beadquarters > Address + shone &
noeded.
17, but Does this go for EPA? KES
16. Did In contact Passles 7 live date.
No relied on recent a correspondence
No recent a correspondence dated 11-30-82 from Talbert Eisenberg
PA well done 1 ADHS
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NOTE

Unless otherwise noted in PA or on separate contact report enclosed, no additional information is available through contact with state or local personnel concerning this site. This situation was verified through the following telephone conversations:

State Contact	E & E Contact	Date
Jim Lemmon (ADHS-Hydrologist)	G. Muehleck	22 March 1983
Bill Williams (Director - Hazardous Waste Section)	K. Greig	23 March 1983

SEPA Notification of Hazardous Waste Site

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper, indicate the letter of the item which applies.

be mailed by June 9, 1981. AZS 000001037 Person Required to Notify: Name Foremost-McKesson, Inc., Chemical Group/Western Region Enter the name and address of the person or organization required to notify. 9040 E. Telegraph Rd., Ste. 301 Zip Code 90240 State CA Downey Site Location: Enter the common name (if known) and actual location of the site. 4 A Z D 0 4 3 8 4 8 9 9 3 County MARICOPA State AZ Zip Code 2550 Person to Contact: Crumm, Enter the name, title (if applicable), and business telephone number of the person (213) 869-2481 $\times 30$ to contact regarding information submitted on this form. Dates of Waste Handling: • Enter the years that you estimate waste From (Year) To (Year) treatment, storage, or disposal began and ended at the site Waste Type: Choose the option you prefer to complete Option I: Select general waste types and source categories. If Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 you do not know the general waste types or sources, you are encouraged to describe the site in Item I-Description of Site. regulations (40 CFR Part 261) General Type of Waste: Source of Waste: Specific Type of Waste: Place an X in the appropriate Place an X in the appropriate EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the boxes. The categories listed boxes appropriate four-digit number in the boxes provided. A copy of overlap Check each applicable the list of hazardous wastes and codes can be obtained by category. contacting the EPA Region serving the State in which the site is 1. D Organics 1. D Mining 2 Construction 2. Inorganics 3.

Solvents 3 D Textiles 4. D Pesticides 4. D Fertilizer 5. D Paper/Printing 5. Heavy metals 6. Acids 6. D Leather Tanning 7. D Bases 7. L3 Iron/Steel Foundry 8. C PCBs 8.

Chemical, General 9. D Mixed Municipal Waste 9.
Plating/Polishing 10. D Unknown 10 □ Military/Ammunition 11. D Other (Specify) 11

Electrical Conductors 12

Transformers Utility Companies □ Sanitary/Refuse 60010 15 (7 Photofinish D Lab Hospital D Unknown 6666 □ Other (Specify) 4 U JUL 1301 Form Approved OMB No. 2000 0438

	Waste Quantity N/A	Facility Type	Total F	acility Waste A	Amount
	Place an X in the appropriate boxes to	1. D Pifes	cubic feet		
	indicate the facility types found at the site.	2 Land Treatment			
	In the "total facility waste amount" space give the estimated combined quantity	3. 🗆 Landfill	galions		
	(volume) of hazardous wastes at the site using cubic feet or gallons.	4. Tanks 5 Impoundment		acility Area	
•	In the "total facility area" space, give the	6 Underground Injection	square fe	et	
	estimated area size which the facilities occupy using square feet or acres	7. Drums, Above Ground	acres		
	coccupy using square reet or ecres	8 Drums, Below Ground 9. Other (Specify)			
	<u></u>				
	Known, Suspected or Likely Releases to		D V	□ Saaaatad	□ Likelii □ Nese
	Place an X in the appropriate boxes to indicate or likely releases of wastes to the environment	i. •			Likely None
	Note: Items Hand I are optional Completing thazardous waste sites. Although completing				cating and assessi
l	Sketch Map of Site Location: (Optional)				
	Sketch a map showing streets, highways, routes or other prominent landmarks near the site Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.	N/A	•		
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	Description of Site: (Optional)				
	Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.	- - N/A -			
-					
	,				
_	Signature and Title:				
,	The person or authorized representative	Name Foremost-McKesson Inc	c. Chem	ical Grou	ID
	(such as plant managers, superintendents,	Western Region Succes 9040 E. Telegraph Rd	,		Owner, Present Owner, Past
	trustees or attorneyer of persons required	suce 9040 E. Telegraph Rd	., Ste.	301	☐ Transporter
:	trustees or attorneys) of persons required to notify must sign the form and provide a S	TOTAL STATE OF THE			
:	trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item'A) For other persons providing		CA san	90240	Oberator, Present
	to notify must sign the form and provide a mailing address (if different than address in item'A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required.	Signature Signature	CA ZID CODE		☑ Operator, Presen ☐ Operator, Past ☑ Other
-	to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check. Other	Signature State	CA ZID CUI		Opërator, Past
-	to notify must sign the form and provide a mailing address (if different than address in item'A) For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify if you are not required to notify check 'Other' This report covers the follow	Signature Size Allegen Swing I.D. Numbers:	_ Date (18/81	□ Opërator, Past 函 Other
-	to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify if you are not required to notify check. Other. This report covers the follocable CAD020745246 CAD00063331.	Signature State Owing I.D. Numbers: 3	Date (COD146295	□ Opërator, Past ☑ Other:
	to notify must sign the form and provide a mailing address (if different than address in item'A) For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify if you are not required to notify check 'Other' This report covers the follow	Signature State Owing I.D. Numbers: 3	Date (18/81	© Operator, Past ■ Other 036 681

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C. THIRD		15.11612.1	D. FOURTH				
(specify)	**************************************	c (specify)					
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OPERATOR INFORMATION	Samuel a market a market in the more life		han in an in the line of the last of the l				
	A NAME			B. Is the name listed in Item VIII-A also the			
FOREMOST MCKESS				OWNER?			
C. STATUS OF OPERATOR (Enter the appro	opriate letter into the answer	r hox: if "Other" specify I	D. PHONE (a	rea code & no.)			
= FEDERAL M = PUBLIC (other than fe = STATE 0 = OTHER (specify) = PRIVATE		ecifyj		8375C5			
E. STREET OR			131 10 1 01 10				
NE POST STREET							
F, CITY OR TOWN		G.STATE H. ZIP CODE	IX. INDIAN LAND				
SAN FRANCISCO		CA 9410	Is the facility located YES 52	on Indian jarids? ☑ NO			
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A NPDES (Discharges to Surface Water)	D. PSD (Air Emissions	from Proposed Sources)					
N	9 P	<u></u>	•	İ			
B. UIC (Underground Injection of Fluids)	15 16 17 19 E. OTHER	(specify)					
		(spe	cify)				
15 17 18 - 30	15 16 17 18	36					
C. RCRA (Hazardous Wastes)	E. OTHER						
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e outline of the facility, the location of each	ch of its existing and pr	oposed intake and discharge	structures, each of it	s hazardous waste			
eatment, storage, or disposal facilities, and ater bodies in the map area. See instructions	for precise requirements		ude all springs, rivers	and other surface			
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NATURE OF BUSINESS (provide a brief descrip	F9: 51	the same being the same and the same of	SAN TONE STATE OF THE SAN THE	10.00 mm			
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McKesson Chemical Company is It also provides various ser		_	_				
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Ise information, including the possibility of							
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A. F	R	ST 1.	EX		ee instructions for d Complete item belou	efinition (of "exu	ting" f	ocility				2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES. PROVIDE THE DATE
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INJ				WELL	D79 GALLONS C D80 ACRE-FEET	the vois	me tha	t					LITERS PER HOUR hysical, chemical, T04 GALLONS PER DAY OR
					would cover depth of one HECTARE-	foot) OF Meter	1		proc	esse 200 1	t not mpoi	occur. ndme	al treatment ring in tanks, rnis or inciner-
oci	EΑ	N E	DIS	ICATION POSAL APOUNDMENT	D81 ACRES OR D82 GALLONS I	PER DAY	OR						processes in : Item III-C.)
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i				DUP	7/2 5	1	1:-\	. 1	7	7		1	
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existing facilities must include in the space provided on p	page 5 a scale drawing o	of the facility isee instruc	tions for mo	ore aet	ail).	and a standard of the	hen ræd	ب ا بيند الابدر ا	F-4.
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l existing facilities must include photographs (aeria	al or ground—level) i	that clearly delineate	all existing	struc	ture	s, existing s	torage,		
atment and disposal areas; and sites of future stor.	age, treatment or dis	nosal areas (see instru	actions for	more	deta	ail).	.स ८ दश स्	4.4.	خفة
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II. FACILITY OWNER	-	the second secon	Property and the	4-30-	الجار	مختاه در بعده: ه	*******		7
	istad in Section VIII or	Form 1 "Ganaral Infor	mation" ni	ace an	"Y"	in the how to	the left	and	-
A. If the facility owner is also the facility operator as li skip to Section IX below.	isted in Section VIII of	General smor	mation , pri	ace air	^	m the box to		· ong	
D. Make facility assessed in particle of political properties and in	med in Costion VIII on	Form 1 complete the f	fallowine ite	me:					
B. If the facility owner is not the facility operator as li	sted in Section VIII on		ollowing ite	1113.					
1. NAME OF FACIL	ITY'S LEGAL OWNER	R			2. 1	HONE NO.	(area cod	de & no.	. ;
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bmitted information is true, accurate, and complet									
cluding the possibility of fine and imprisonment.	ADDITIO	NAL INFOR	2MATI	ioN		1/21	182	•	
NAME (print or type)	B. SIGNATURE			c.	DAT	ESIGNED			
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OPERATOR CERTIFICATION	all bornes better bearing			سننسل	- 27	· Ellandian		latin.	, ,
ertify under penalty of law that I have personally	examined and am fa	miliar with the inform	nation subi	mitte	d in	this and all	attacné	o b	
cuments, and that based on my inquiry of those in bmitted information is true, accurate, and complet									
cluding the possibility of fine and imprisonment.	, r um gmarc triat t	o ore significant pe		J. 1011		g . 1		•	
NAME (print or type)	B. SIGNATURE			16	DAT	E SIGNED			
		afterlow		1	1/	15/80	•		
1. M. MCMAHON	WIFIII	a pour un				/ • -			

nease print or type in the unshaded areas only. fill-in areas are spaced for clite type, i.e., 12 characters	Form Approved OMB No. 158-500004
HAZARDOUS JASTE PERMIT APPLICATION	PAILD NUMBER
Consolidate I Pennets Program (Tais information is required under Section 2005 of RCRA.)	[[A]Z[] [[4] [5] [5] [7] [7] [3]
OR OFFICIAL USE ONLY	Santa Cara Cara Cara Cara Cara Cara Cara Ca
APPROVED (Sr. mo, & day)	
I. FIRST OR REVISED APPLICATION	
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the fi evised application. If this is your first application and you already know your facility's EPA I.D. Number PA I.D. Number in Item I above.	rst application you are submitting for your facility or a
A. FIRST APPLICATION (place an "X" below and provide the appropriate date) [X] 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES.
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	YR. MO. DAY THE DATE (Vr. mo , & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
[7] [7] [7] [7] [7] [7] [7] [7] [7] [7]	2. FACILITY HAS A RCRA PERMIT
II PROCESSES CODES AND DESIGN CARACITIES	
A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process	s to be used at the facility. Ten lines are provided for
entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be u describe the process (including its design capacity) in the space provided on the form (Item III-C).	sed that is not included in the list of codes below, then
3. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the proces	5.
 AMOUNT — Enter the amount. UNIT OF MEASURE — For each amount entered in column 8(1), enter the code from the list of uneasure used. Only the units of measure that are listed below should be used. 	nit measure codes below that describes the unit of
PRO- APPROPRIATE UNITS OF	PRO- APPROPRIATE UNITS OF
PROCESS CODE DESIGN CAPACITY PROCESS PROCESS CODE DESIGN CAPACITY PROCESS	CESS MEASURE FOR PROCESS CODE DESIGN CAPACITY
Storage: Treatment: CONTAINER (barrel, drum, etc.) SOI GALLONS OR LITERS TAYLOR	T01 GALLONS PER DAY OR
TANK WASTE PILE S03 CUBIC YARDS OR SUFFACE IMPOUNDM	ENT TO2 GALLONS PER DAY OR
SURFACE IMPOUNDMENT S04 GALLONS OR LITERS INCINERATOR	LITERS PER DAY TO3 TONS PER HOUR OR METRIC TONS PER HOUR;
Disposal: INJECTION WELL D79 GALLONS OR LITERS	GALLONS PER HOUR OR LITERS PER HOUR
LANDFILL D80 ACRE-FEET the volume that OTHER (Use for physic would cover on acre to a thermal or biological tredepth of one foliogical tredepth of one foliogical tredepth of one foliogical tredepth of one foliogical tredepth of the foli	atment LITERS PER DAY
HECTARE-METER Surface impoundments of across Describe the production OCEAN DISPOSAL D82 GALLONG TER DAY OR the space provided; Item	r incinér- esses in
SURFACE IMPOUNDMENT D83 GALLONS OF LITERS	. 117-6.7
UNIT OF UNIT OF	UNIT OF
UNIT OF MEASURE CODE UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONSV LITERS L TONS PER HOURD	ACRE-FEETA HECTARE-METERF
CUBIC YARDS Y METRIC TONS PER HOUR W CUBIC METERS C GALLONS PER HOUR E GALLONS PER DOUR H	ACRESB HectaresQ
XAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two	o storage tanks, one tank can hold 200 gallons and the
ther can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.	
DUP 1	
	PROCESS DESIGN CAPACITY FOR
2. UNIT OFFICIAL M CLSS	1. AMOUNT 2 UNIT OFFICIAL USE
CODE (from list above) 1. AMOUNT (specify) (specify) OF MEA- SURE (center code) ONLY JZ above)	(enter code)
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1 SCI IN 55 CAL. DRUMS G 7	
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16 - 18 19 - 27 28 29 - 12 16 - 18 19	, , , , , , , , , , , , , , , , , , , ,

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ACE FOR ADDITIONAL PROCESS CODES OF	RFORD	SCRIBING OTHER	PROCESSES (code	"TU4"). FOR EACH PROCESS ENTERED HERE	ان است ا
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DESCRIPTION OF HAZARDOUS WAST	ES	esiment titalente de la familia	an harman harman har his	مالدد والدوام والمتحدد والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض	
PA HAZARDOUS WASTE NULIBER - Enter	the four-	Subpart D, enter the	no CHR, Subpart D'i four-digit number <i>ls)</i>	or each histor historious waste you will handle. If you from 40 CFR, Subpart C that describes the characteris-	
STIMATED ANNUAL QUANTITY — For each asis, For each characteristic or toxic contaminal thich possess that characteristic or contaminant.	n listed wa nt entered	ste entered in colun in column A estimat	nn A estimate the que e the total annual qua	antity of that waste that will be handled on an annual antity of all the non—listed waste(s) that will be handled	
NIT OF MEASURE — For each quantity enter odes are:	ed in colu	mn B enter the unit	of measure code. U	nits of measure which must be used and the appropriate	
ENGLISH UNIT OF MEASURE		CODE	METRIC UNIT	OF MEASURE CODE	
TONS		т			
count the appropriate density or specific gravity			azare mast be conven	ed into one of the required units of measure taking into	
ROCESSES . PROCESS CODES:				de fel feers about the effection and a spatial and in Mars III.	
to indicate how the wasterwill be stored, treat For non-listed hazardous wastes: For each	ed, and/or characteris	disposed of at the fa tic or toxic contain	cility. inant entered in colu	de(s) from the list of process codes contained in Item III mn A, select the code(s) from the list of process codes	,
contained in Item III to indicate all the pro that characteristic or toxic contaminant.	cesses that	will be used to sto	re, treat, and/or disp	ose of all the non-listed hazardous wastes that possess	•
extreme right box of Item IV-D(1); and (3) Er	g process iter in the	space provided on pa	needed: (1) Enter the age 4, the line number	e first three as described above; (2) Enter "000" in the rand the additional code(s).	
. PROCESS DESCRIPTION: If a code is not list					
than one EPA Hazardous Waste Number shall b	e describe	d on the form as foll	ows:	IUMBER — Hazardous wastes that can be described by plete columns B,C, and D by estimating the total annual	
quantity of the waste and describing all the pr	ocesses to	be used to treat, sto	re, and/or dispose of t		
"included with above" and make no other ent Repeat step 2 for each other EPA Hazardous \	ries on tha	t line.			
				acility will treat and dispose of an estimated 900 pounds reat and dispose of three non-listed wastes. Two wastes	
	00 pounds	per year of each wa	ste. The other waste	is corrosive and ignitable and there will be an estimated	
A. EPA HAZARD. B. ESTIMATED ANNUAL	C. UNIT			D. PROCESSES	_
(enter code)	(cnter code)		ess CODES	2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
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D 0 0 2 400	P	T 0 3 D 8 0	1	`	
D 0 0 1 100	P	T O 3 D 8 0			
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FACILITY OWNER			e despuise proportion and a second	رمدادید. معملات		raniani malanini	with the wife	الودن) الودني	er Tek Levie		~7
A. If the facility owner is also the facility operator as I skip to Section IX below.	listed in Section VIII	on Form 1, "General Info	rmation", place	an "	X" in	the bo	x to th	ne le	eft and	d	
B. If the facility owner is not the facility operator as I	isted in Section VIII	on Form 1, complete the	following items:	:							
1. NAME OF FACIL	ITY'S LEGAL OWN	ER		\neg	2. PH	ONE N	10. (a)	ea c	ode &	no.	,
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M. MCMAHON	Com	12/lation		/	//	18	\mathcal{O}				

PAGE 4 OF 5

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DI SCRIPTION OF HAZARDOUS WASTES (wed) SCODES FROM ITEM D(1) ON PAGE 3.

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				WA20043	1848993	
IX. DESCRIPTION OF HAZ	ARDOUS WASTES	continued from	front)	Marining and American	Periodical discussion of the second	ي ا بنيان بزرن لي
A. HAZARDOUS WASTES FRO waste from non-specific source	M NON-SPECIFIC SOL	JRCES. Enter the	four-digit number from	40 CFR Part 261.31 for	r each listed hazardous	4000
1 1 23 - 26 7 23 - 26	2 \(\) \(3 24 9 25 25 25 25 25 25 25 25 25 25 25 25 25	23 26 10	5 11 23 - 26	23 - 26	
B. HAZARDOUS WASTES FRO specific industrial sources your	m SPECIFIC SOURCES rinstallation handles. U	se additional sheets	ligit number from 40 CFs if necessary.	H Part 261.32 for each I	isted nazardous waste fr	om
13 23 - 26 19 23 - 26 25 23 - 26	23 - 26 20 21 - 26 26 - 26	23 - 26 21 23 - 25 27 21 - 25	23 - 25 22 23 - 26 28 23 - 26	23 - 26 23 23 - 26 29 29	23 - 26 24 23 - 26 30 23 - 26	
C. COMMERCIAL CHEMICAL P stance your installation handle	PRODUCT HAZARDOL es which may be a hazar	JS WASTES. Enter dous waste. Use ad	the four—digit number diditional sheets if necessa	from 40 CFR Part 261.3 Iry.	3 for each chemical sub-	
31 P 0 2 9 23 - 26 37 W 1 1 0 23 - 25 43 W 1 5 4 23 - 26	32 (33 id 6 0 2 23 · 26 39 id 1 2 2 23 · 25 45 id 2 2 0 23 · 25	34 U C I G 23 - 26 40 U I 3 3 23 - 26 46 U Z Z G 23 - 25	35 U 0 3 (23 - 26 41 U (3 4 23 - 25 47 U 2 3 C(23 - 26	36 4 0 4 3 23 - 26 42 U 4 0 23 - 26 48	
D. LISTED INFECTIOUS WAST hospitals, medical and research					from hospitals, vetering	ary
49	50	5 (52	23 - 26	. 54	
E. CHARACTERISTICS OF NOT hazardous wastes your installa				sponding to the characte	ristics of non-listed	
1. IGNITABLE	[<u>V</u>] 2. (D002)	CORROSIVE	3. REAC (D003)		4. TOXIC	
X. CERTIFICATION	and to the last the last of th			The same representation of the same of the		
I certify under penalty of attached documents, and the I believe that the submitted mitting false information, in	hat based on my inq I information is true	uiry of those inc , accurate, and c	lividuals im <mark>mediate</mark> ly complete. I am aware	responsible for obta	ining the information	71,
SIGNATURE .		NAME & OF	FICIAL TITLE (type or)	print)	DATE SIGNED	

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EPA Form 8700-12 (6-80) REVERSE

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C DAME D & TOTAL CONTROL OF THE CONT	INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the			
INSTALLA- TION'S EPA I.D. NO. INSTALLA- information on the label is incorre through it and supply the corre in the appropriate section below.	ect, draw a line ct information			
NAME OF IN- I. STALLATION Complete and correct, leave Item below blank. If you did not recei	s I, II, and III			
INSTALLA-	ation" means a			
II. MAILING ADDRESS PLEASE PLACE LABEL IN THIS SPACE treated, stored and/or disposed porter's principal place of business				
to the INSTRUCTIONS FOR FI				
LOCATION information requested herein is a section 3010 of the Resource Control information requested herein is a section 3010 of the Resource Control information requested herein is a section 3010 of the Resource Control				
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FOR OFFICIAL USE ONLY	WILLIAM TO			
E I I I I I I I I I I I I I I I I I I I	-			
INSTALLATION'S FRAID NUMBER APPROVED DATE RECEIVED	<u></u>			
I. NAME OF INSTALLATION				
McKesson Chemical Company				
II. INSTALLATION MAILING ADDRESS				
STREET OR P.O. BOX				
3 PO BOX 14799				
CITY OR TOWN ST. ZIP CODE				
4 Phoenix AZ85063				
III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER				
5 4909 West Pasadena Avenue				
CITY OR TOWN ST. ZIP CODE				
6 Glendale	į			
IV. INSTALLATION CONTACT				
NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no. 2 - 9 3 7 - 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4				
2 N e V 1 1 1 e				
A. NAME OF INSTALLATION'S LEGAL OWNER				
8 Foremost McKesson Inc.				
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate bo	2 200 000			
F = FEDERAL 37 Seneration Same Sa	m VII)			
M = NON-FEDERAL M X C. TREAT/OTORE/DISPOSE D. UNDERGROUND INJECTION				
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))				
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subseque	nt notification.			
If this is not your first notification, enter your installation's EFA I.D. Number in the space provided below. C. INSTALLATION'S	EPA LD NO			
X A. FIRST NOTIFICATION D. SUBSEQUENT NOTIFICATION (complete item C)				
IX. DESCRIPTION OF HAZARDOUS WASTES				

I.D. - FOR OFFICIAL USE ONLY

			Ţ	V420043	8489935
IX. DESCRIPTION OF HAZ	ARDOUS WASTES (co	ontinued from fron			
A. HAZARDOUS WASTES FRO waste from non—specific sour	M NON-SPECIFIC SOUP	RCES. Enter the four-	-digit number from 40	CFR Part 261.31 for	each listed hazardous
F 0 0 7 23 - 25 Electronic.	2 23 - 26 8 23 - 26 23 - 26	3 	23 - 26 - 10 - 23 - 25	23 - 26	6 12 12
B. HAZARDOUS WASTES FRO specific industrial sources you				Part 261.32 for each lis	ted hazardous waste from
13 23 · 26 19 21 · 26 25 25	23 - 26 20 23 - 26 26 26 23 - 26	21	23 - 26 22 23 - 26 28	23 - 26 23 - 26 29	18 23 - 26 24 23 - 26 30
C. COMMERCIAL CHEMICAL I stance your installation handle	PRODUCT HAZARDOUS es which may be a hazardo	WASTES. Enter the tous waste. Use addition	four—digit number fro nal sheets if necessary.	m 40 CFR Part 261.33 See attachme	for each chemical sub- nt.
U 0 0 2 23 26 37 U 2 2 8 23 26 43	32 U 2 2 6 38	39	34 U 1 5 9 23 - 26 40	35 U 2 1 0 23 - 26 41 23 - 26 47	U 2 3 9 23 - 26 42 23 - 26 48
D. LISTED INFECTIOUS WAST hospitals, medical and researc				listed hazardous waste	from hospitals, veterinary
49 23 - 26 E. CHARACTERISTICS OF NO	50 23 - 26 22	51 3 - 26	52 	53 23 - 26	54 23 - 26
hazardous wastes your installa	ation handles. (See 40 CF)			VE	4. TOXIC
X. CERTIFICATION I certify under penalty of attached documents, and t I believe that the submittee mitting false information, in	law that I have persor that based on my inquid d information is true, o	iry of those individ accurate, and comp	am familiar with t uals immediately re plete. I am aware th	esponsible for obtain	ning the information,
SIGNATURE SI BUT	tu	G. N. Bu	tter, Technica Chemical Comp	al Director	8-14-80

EPA Form 8700-12 (6-80) REVERSE

- All	INSTALLA- TION'S EPA I.D. NO. I. NAME OF IN- STALLATION II. MAILING ADDRESS LOCATION III. OF INSTAL- LATION	NOTIFICA	SE PLACE LAB	RDOUS WAS	STE ACT		label, affinformation through in the ap complete below bla label, com single site treated, sporter's potential to the IN CATION information.	etions: If you in the spoon on the labe t and supply propriate sections, If you did not the labe twhere hazar stored and/or incipal place is TRUCTIONS before compon requested 18010 of the Right.	ece at left is incorrection below leave Item I not receipts. "Install dous was of business FOR FI pleting It herein is incorrection."	ft. If ar rect, dr ect infe v. If the ive a pi lation" ite is go of, or ess. Ple ILING his for require	oy of the awa line ormation e label is , and III reprinted means a enerated, a transase refer NOTIFI-rm. The d by law
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GSA No. 0246-EPA-OT

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I.D. - FOR OFFICIAL USE ONLY

EPA Form (700-12 (6-80) REVERSE

Form Approved OMB No. 158-S79016

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EPA Form 8700-12 (6-80) REVERSE

CORRESPONDENCE SUMMARY SHEET g Name/Location 420043848993 Kesson To/Date Received fom/Date Sent Pages Transaction Description 1-19-81 Part A application copy MHS temporary approval to operate McKess-ADHS N.J. 7:11 Michesson ALR Suc Regent for Part & App 4/4/82 5-17-82 Letter/Closure Plan Hekesson ADHS per Insp. 4. FALLLITY SELF-Checkust 12 Emercacy Response (Continuoning) Plan 33 J. TILL NEVILLE ED BLACKBURN MCKESSON CHENCOL 3 FACILITY INSPECTION NEVIELE J. TILL BRUCE SCOT MCKESSON CHEMI-Request for Part Bot Application CAL COMPANY Bud S Mouday Neville J. T. II Mello-sen Chand for Hazardous linete Fraility Persont Letter ref to compliance lette like Banco 1 Blackburn 21 6-30-82 our 5-21-82 6-29-82 Ted Blackburn Mike Bango EHS 7-13-82 mickesson Chancello Z Letter requesting additional items Everification Ted Blacken mile Bango Letter requesting addle them 9-8-82 1. 3:11 R. Crumni Letter requesting withdrawal of Part A Bill Wilson EPA 2: 10-6-82 10-18-82 Late submittal of Part B Remit application. Bile Blindale Facilità. submitted Crum diciments since they requested unthorough 10-21-82 alan Russ support proposed example from ag. H. W. Permit 11-2-8 a 11-18-82 Results of Inspection F PH Monitoring system 11-30-82 T.E.

ARIZONA PARTMENT OF HEALTH RVICES

Inter-Office Memorandum

To: Technical Support Files

DATE: November 30, 1982

THRU:

FROM: Talbert Eisenberg

Environmental Health Specialist

RE: McKesson Chemical

Mike Bango telephoned to report that a continuous flow pH monitoring system has been obtained from the City of Glendale, and that continuous pH monitoring of the neutralization pit will begin this week.

The City of Glendale has requested that their strip chart, on which the pH results are recorded, be returned to them and not to be submitted to us. Either a copy of the strip chart will be submitted, or the data from the original chart will be transcribed for further analysis.

Thirty days of data will be compiled, and based on the results a determination will be made whether or not to request a Part B application.

On November 17, 1982 a visit was paid to McKesson Chemical to determine the pH values of the rinse waters entering the hazardous waste treatment facility. The influent rinse waters are generated from the cleaning of empty nitric (HNO $_3$), muriatic (HCl), sulfuric (H $_2$ SO $_4$), and caustic soda (NaOH) containers.

The treatment facility is a 2' wide by 9' long by 4' deep below ground lined pit. The volume of the pit is approximately 540 gal. Approximately 300 gpd of rinse waters are neutralized in the pit prior to discharge into the City of Glendale sewer system.

An Orion portable pH meter was used to measure the pH values of the different rinse waters. The pH meter was calibrated with laboratory buffer solutions of pH 2, 7, and 10 prior to testing. The emptied returnable containers of $\rm H_2SO_4$, $\rm HNO_3$, $\rm HCl$, and $\rm NaOH$ were filled with tap water and mixed.

The pH value of HNO₃ averaged 1.60 (n=3), the pH value of HCl averaged 2.0 (n=3), the pH value of ${\rm H_2SO_4}$ averaged 1.60 (n=3), and the pH value of NaOH averaged 11.0 (n=3).

The HNO₃ and H₂SO₄ rinse waters meet the hazardous waste characteristic of corrosivity. The HCl rinse water lies on the borderline and the NaOH rinse water does not meet the hazardous waste characteristic.

1982 sales to date of HCl, HNO3, $\rm H_2SO_4$, and NaOH on a weight basis and percent total weight basis are approximately:

	1ь (10 ⁶)	% Total
NaOH	1.002 1.002	30.9
HC1 H ₂ S0 ₄	.805	30.9 24.8
HNO ³	.434	13.4
3	3.243	100.0

Rinse waters of the four corrosives were mixed according to the above percent weight total. The pH value of the mixture was 9.4 which does not meet the corrosivity characteristic. With proper management, the pH of the treatment pit could easily be kept within a pH range of 2 to 12.5 and therefore be considered a non-hazardous waste.

Based on the short storage time (less than one week) of the empty returnable containers prior to rinsing, the absence of metals in the waste stream, the physical dimensions of the treatment facility, and the fact that the only treatment occurring is mixing of acidic and alkaline rinse waters.

McKesson has a strong case for not submitting a Part B.

As mentioned in our letter of November 2, McKesson has been requested to submit the results of a 30 day continuous pH monitoring of the treatment pit. We believe that with proper management (i.e., use NaOH rinse water for the first influent), the pH of the treatment tank can be maintained within the range of 2 to 12.5 and McKesson will not be required to submit a Part B.

7. Sert (:smbert 1/18/82



ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

REF: TS 0650

November 2, 1982

BRUCE BABBITT, Governor JAMES E SARN, M.D., M.P.H., Director

> Mike Bango, Operations Manager McKesson Chemical Company P.O. Box 14799 Phoenix, AZ 85063

Dear Mr. Bango,

RE: Glendale facility (EPA ID No. AZD043848993)

To support your proposed exemption from an Arizona hazardous waste permit, we are requesting the following items.

- 1. An on-site inspection of the treatment facility by a representative of the Technical Support Section of the Bureau of Waste Control.
- 2. Results of a 30 day <u>continuous</u> pH monitoring of the pH adjustment tank.
- 3. Results of an EP toxicity test for heavy metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag) for the pH adjustment tank.

Based on the results of the above items, we shall determine if a Part B permit application is required. Since your Part B permit application is already past due, we are requesting that the continuous pH monitoring and EP toxicity test be submitted no later than January 1, 1983. If there are any problems meeting the above requirements, do not hesitate to contact me.

Sincerely.

Alan L. (Roesler

Alan L. Roesler, R.G., Manager Technical Support Section Bureau of Waste Control

ALR:ns



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

October 21, 1982

Bill R. Crumm, Sr.
Assistant Regional Operations Manager
McKesson Chemical Company
Western Region
9040 Telegraph Road
Downey, CA 90240

Re: Glendale, AZ Facility (EPA ID# AZD043848993)

Dear Mr. Crumm:

We have reviewed your request for withdrawal of your permit application for the facility referenced above, submitted pursuant to Section 3005 of the Resource Conservation and Recovery Act. In accordance with your request, we are returning the documents which you submitted.

Should it be necessary for you to re-apply for a hazardous waste facility permit, you should contact us for the procedures to be followed.

Sincerely yours,

William D. Wilson

Toxics & Waste Management Division

Enclosure

cc: Al Roessler, Arizona DOHS

ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

BRUCE BABBITT, Governor JAMES E. SARN, M.D., M.P.H., Director REF: TS 0631

October 19, 1982

Bill R. Crumm, Sr. Assistant Regional Operations Manager McKesson Chemical Company 9040 Telegraph Road Downey, CA 90240

Dear Mr. Crumm:

RE: Late Submittal of Part B Permit Application to Arizona Department of Health Services (ADHS) Reflecting Treatment at Glendale Facility (EPA ID No. AZD043848993)

In reference to your telephone conversation of October 19, 1982 with Alan L. Roesler, Manager of the Technical Support Section, you were reminded at that time of your responsibility to submit a Part B permit application to the ADHS under the authority of A.C.R.R. R9-8-1820.A.5.c of the State hazardous waste regulations. Our letter to your facility, dated April 21, 1982, had specifically requested this permit application to be submitted to our office by October 18, 1982.

Since your facility (listed above) is considering other alternatives to elementary neutralization, which is regulated by ADHS, Mr. Roesler has extended to October 29 the date by which ADHS must determine whether this facility chooses to continue a treatment process regulated by State hazardous waste regulations, or whether some other alternative will be utilized to handle rinsate acid wastes from drums at this facility.

ADHS will not rescind its request for a Part B permit application while this facility continues to operate an elementary neutralization unit. At the same time, we will not refer the violation of the late Part B submittal to our Attorney General's office until we receive further notification of your future facility intentions (or after October 29).

Should you choose to maintain the Glendale facility as a regulated treatment facility, we again will extend our offer of technical assistance necessary to help your staff or consultant submit a complete permit application. Another requested submittal date will have to be negotiated at a later time, if your facility chooses to maintain treatment standards outlined in the Arizona State hazardous waste regulations.

Sincerely,

R. Bruce Scott, P.E., Chief Bureau of Waste Control

RBA:ns

The Department of Health Services is An Equal Opportunity Affirmative Action Employer. All qualified men and women, including the handicapped, are encouraged to participate.

Foremost-McKesson Chemical Group McKesson Chemical Company Western Region 9040 Telegraph Road Downey, CA 90240 213 869 2481

October 6, 1982



Mr. Wm. D. Wilson (T-2-2) U. S. E. P. A. Region IX 215 Fremont St. San Francisco, CA 94105

Dear Mr. Wilson:

Upon review of the criteria for securing a hazardous facility waste permit, we have decided that it would not be feasible to operate as a storage facility at our Glendale, Arizona location. Therefore, we would like to withdraw from interim status at this time.

Enclosed is form 8700-12 properly executed and signed that will change the Glendale, Arizona facility from a T S & D to a transporter generator only.

We would appreciate a confirmation of our request by return mail.

We thank you for your consideration and if there are any questions or you need anything further, please contact us.

Sincerely,

Bill R. Crumm, Sr.

Assistant Regional Operations Manager

BRC:sw

Encl.

cc: A. M. McMahon - Western Region Vice President

D. L. Eisner - Home Office Operations Technical Director

C. W. Uhrich - Denver District Manager J. T. NeVille - Phoenix Branch Manager



GSA No. 0246-EPA-OT

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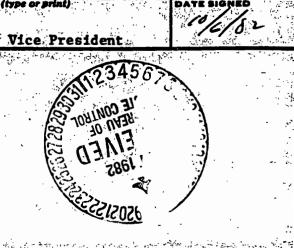
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EPA Form 8700-12 (8-80) REVERSE

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ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

Ref. No. HW 1126 September 8, 1982

BRUCE BABBITT, Governor

JAMES E. SARN, M.D., M.P.H., Director

Mr. Mike Bango Operations Manager McKesson Chemical Company P.O. Box 14799 Phoenix, Arizona 85063

Dear Mr. Bango:

The Interim Status Standards (I.S.S.) reinspection of your facility conducted on August 24, 1982 revealed certain deficiencies which still require additional information or verification in order to fulfill regulatory obligations. Specific deficiency items discussed at this meeting are outlined below for clarification:

- 1. General Inspection Requirements (R9-8-1821.F. and 40 CFR 265.15)
 - A. The Written Schedule must identify the types of problems which are to be looked for during inspections.
 - B. The Inspection Log must have space allocation for a description or notation of corrective actions taken as required.
- 2. Contingency Plan (R(-8-1821.E. and 40 CFR 265.52)
 - A. A description and/or outline of emergency equipment capabilities must be incorporated into the plan.
- 3. Waste Analysis Plan (R9-8-1821.A. and 40 CFR 265.13)
 - A. Waste analysis plans and needs as outlined under the above-referenced regulations are to be incorporated into the plan.
- 4. Operating Log (R9-8-1821.F. and 40 CFR 265.73)
 - A. Incorporation of all required items as outlined by the regulations into an operating log is needed.

The proposed compliance date for the above-listed deficiencies is thirty-five (35) days following receipt of this letter. If you have any questions, please contact this Bureau at 255-1160.

Sincerely,

Ted Blackburn

Environmental Health Specialist

TB:ct

CC The Department of Health Services is An Equal Opportunity Affirmative Action Employer. All qualified men and women, including the handicapped, are encouraged to participate.

Panit File



ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

Ref. No. HW 1112 July 13, 1982

BRUCE BABBITT, Governor JAMES E. SARN, M.D., M.P.H., Director

CERTIFIED MAIL

Mr. Mike Bango, Operations Manager McKesson Chemical Company P.O. Box 14799 Phoenix, Arizona 85063

Dear Mr. Bango:

This Bureau is in receipt of your letter of June 29, 1982 which notes criteria to attain achievement of R.C.R.A. Interim Status Standards (I.S.S.). In the following paragraphs you will note items which require additional information or verification. In the coming weeks your company will be notified of a reinspection whereby items listed below will be verified and discussed as needed. Please refer to this Bureau's letter dated May 21, 1982 for a numerical outline of the items noted below.

- 1. General Inspection Requirements (R9-8-1821 E.,F.: 40 CFR 265.15)
 A. Written Schedule
 - 1. Must identify types of problems which are to be looked for during inspections, e.g. containers: weekly for leaks or deterioration caused by corrosion or other factors.

 tanks: daily for discharge control equipment, monitoring equipment, waste level; weekly for construction materials of tank and surrounding area.
 - B. Inspection Log
 - 1. Must have date and time of inspection, name of inspector, notation of observations made, date and nature of repairs or other remedial actions taken.
- 2. Contingency Plan (R9-8-1821 E.3.; 40 CFR 265.52)
 - A. Must include a listing of all emergency equipment with location, description, and capabilities. This includes spill control equipment, communications equipment, decontamination equipment, etc.
- 3. Adequate for I.S.S. Refusals to be noted in operational log.

Mr. Mike Bango July 13, 1982 Page Two

- 4. Waste Analysis Plan (R9-8-1821 A; 40 CFR 265.13 c)
 - A. Specifically states that for off-site facilities the waste analysis plan specified in paragraph (b) must also specify procedures to be used to inspect and, if necessary, analyze each movement of hazardous waste received in order to verify the identity as that matching the accompanying manifest. This includes sampling methods to assure a representative sample.
- 5. Adequate for I.S.S. Installation to be verified.
- 6. Operating log (R9-8-1821 F; 40 CFR 265.73)
 - A. The operating log must include:
 - 1. Description and quantity of each waste received with the method and date of treatment.
 - 2. Location of hazardous waste and quantity of, cross reference with manifest number if accompanied by manifest.
 - 3. Records and results of waste analysis and trial tests as specified in 265.13) (Waste Analysis Plan).
 - 4. Incident reports.
 - 5. Inspection reports and results.
 - 6. Closure cost estimates.
- 7. Personnel Training (R9-8-1821 F.; 40 CFR 265.16)
 - A. Verification that records documenting that training or job experience has been given.
- 8. Adequate for I.S.S.
- 9. Adequate for I.S.S.
- 10. Adequate for I.S.S.
- 11. Adequate for I.S.S.

If you have any questions please contact this office at 255-1160.

Sincerely

Ted Blackburn

Environmental Health Specialist

TB:ct Cc: Technical Support

EPA #: AZ DO43848993

HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT APPLICANT DISPOSITION LOG

Facility Name: McKesson Chemical Co Location: 4909 West Residence Ave, Glendale Type of facility: 5/7 Existing 🔀 New Date Date Completed Initiated Initials Comments (received) (sent) Notification of intent to apply received Facility Disposition Log initiated 1/15/81 Via EPA Region IX Part A received Filing System Initiated Correspondence folder Summary sheet Facility Plans folder Monitoring folder Summary sheet Recordkeeping folder Summary sheet Confidential folder Summary sheet Internal Bureau Memos folder Map & Blueprint file Public comment/Public notice folder Part A receipt aknowledged form letter

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Part A information compilation	Jes_	4 (Den
Facility name tables (summary sheet)	J	***********	
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Process tables	<u> </u>		· · · · · · · · · · · · · · · · · · ·
H.W. by EPA# tables	J.		
Data Management Informal			
Part A reviewed for Temporary Approval	1/19/81		
Determination made that permit is required		·	
Memo to management of intent - due date for response			
Permit not required letter sent			
Temporary approval given, form letter sent	1/19/81	· · · · · · · · · · · · · · · · · · ·	
Temporary approval not given, letter sent		· · ·	
Facility info integrated into permit program			
Status report to EPA		· 	
Priority Assigned A2 - 2			
Priority sheet	opts		
Master Priority list			·
Priority Report			
Priority Scoping Meeting		~	· ·

Comments

•	Date initiated (received)	Date completed (sent)	Initials	Comments
Tracking Initiated	Yes		2	à.
Master Names List			·	
Master Address List		-	5.	
Master Disposition Log		· .		
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Part B requested				•
Part B information re- quirement ascertained	· · · · · · · · · · · · · · · · · · ·			
Memo to Bureau Admin of findings and suggested action with due date for response			· · · · · · · · · · · · · · · · · · ·	
Intent approved			. <u> </u>	- !
Form letter sent (registered mail)		4/4/82	<u> </u>	
Instructions for permit sent			· .	
Modules sent				
Due date assigned & logged	One >	10/18/82	·.	
Application sent		1		- 44
Pre-Application con- ference suggested	Conterne held 5/4/82		• •	
Registered Mail receipt received	Yer_		<u> </u>	:
Pre-Application Conference		***	•	· 27
Management notified		Yes		
Applicant given procedures list		-		
Final determination made of need for Part B			·	
Compliance schedules & waives discussed (1820.I.2) (1821.I) (1815.B)				

	Date Initiated (received)	Date Completed (sent)	Initial	Comments
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Part B Scoping Meeting		 -		
Review responsibilities list assignments made			1.	
Review/Permit writing lead assigned				٩.
Review due dates determined				
Part B Completeness Review		·		
Topic/Module Review	·			·
Application			· ·	· , -
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Deficiency sheet prepared			· · · · · · · · · · · · · · · · · · ·	-
Memo of findings to management				
Suggested action				
Due date for response				



ARIZON DEPARTMENT OF ALTH SERVICES

Division of Environmental Health Services

Ref. No. HW 1053 May 21, 1982

BRUCE BABBITT, Governor

JAMES E. SARN, M.D., M.P.H., Director

CERTIFIED MAIL

Mr. J. Till Neville, Manager McKesson Chemical Company P.O. Box 14799 Phoenix, Arizona 85063

Dear Mr. Neville:

Re: Facility Inspection: AZD 043848993

On May 17, 1982 an inspection of McKesson Chemical Company, located at 4909 West Pasadena Avenue, Glendale, Arizona, was conducted for the purpose of determining compliance with ACRR R9-8-1800, the Arizona Hazardous Waste Regulations. The purpose of this letter is to report to you the results of that inspection and to propose a compliance schedule for correcting deficiencies listed below.

This letter is being sent to you as the contact person identified in the Part A permit application on file with the Arizona Department of Health Services. As contact person you must have the authority to negotiate a compliance schedule to correct deficiencies. If another individual should be receiving this letter or if you wish additional copies sent to specific parties, please notify this Bureau.

In the following list of deficiencies references are made to applicable State regulations and where appropriate, rederal requirements that must be met to achieve compliance with interim status standards.

- 1. General Inspection Requirements, Inspections and Inspection Log, (R9-8-1821 E.F. and 40 CFR 265.15) requires inspections to follow a written schedule and time frame for specific equipment and processes. In addition, the regulations require that an inspection log or summary be kept. Investigation revealed that your facility conducts only monthly inspections. Cross references for specific time schedules can be found under 40 CFR 265.174 and 265.194 for your facility.
- 2. Contingency Plan (R9-8-1821 E.3. and 40 CFR 265.52) Refers to contingency plan content, specifically in this case describing arrangements agreed to by local response agencies; a listing of names, addresses and phone numbers (office and home) of all qualified emergency coodrinates;

The Department of Health Services is An Equal Opportunity Affirmative Action Employer. All qualified men and women, including the handicapped, are encouraged to participate.

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Mr. J. Till Neville, Manager May 21, 1982 Page Two

- a listing of all emergency equipment at the facility, including the location, physical description and a brief outline of its capabilities; and actions taken by facility personnel to comply with 40 CFR 265.51, 265.56 and R9-8-1821 E.5.
- 3. Copies of Contingency Plan (R9-8-1821 E.4. and 40 CFR 265.53) States that a copy of the contingency plan be maintained at the facility and submitted to all agencies with which formal arrangements have been made. In this case if copies were not given, or if refused by certain agencies, incorporate in the contingency plan a notation of arrangements made with various agencies, contact methods and dates.
- 4. <u>Waste Analysis Plan</u> (R9-8-1821 A. and 40 CFR 265, 13 b.) A written plan must be developed describing procedures to be followed to comply with all waste analysis requirements. The federal regulation provides details regarding plan content.
- 5. Warning Signs (R9-8-1821 A. and 40 CFR 265.14 c.) Signs warning against unauthorized entry must be posted at each entrance to the active portion of the facility and at other locations in sufficient number to be seen from any approach to the active portion. In this case, warning signs should be specifically installed near the neutralization tank and at the western boundary fence near the drum storage area.
- 6. Operating Log (R9-8-1821 F. and 40 CFR 265.73) A written operating record must be kept at the facility. A description of required items is listed under the Federal regulation.
- 7. Personnel Training (R9-8-1821 F. and 40 CFR 265.16). The Federal regulation specifically give requirements for personnel training and record keeping that must be fulfilled.
- 8. Closure Plan and Cost Estimate (R9-8-1821 A.; 40 CFR Part 265, Subpart G and 40 CFR 265-142). A written plan is required describing steps to be taken for closure of the facility. This plan must be kept at the facility along with written estimates of closure costs. In addition to the drum storage area Arizona regulations view the neutralization tank as an active portion of the facility and as such requires closure plans, cost estimates and a closure time schedule.
- 9. Tanks (R9-8-1821 B. and 40 CFR Part 265 Subpart 5) Contains provisions for the safe and proper operation of facilities utilizing tanks in their operation. Specific mention is given to general operating requirements and inspections. In this case specific items to be addressed are freeboard level, analysis, inspections and closure. Some of these items will be addressed under separate headings within this letter.
- 10. Containers (40 CFR Part 625 Subpart I) Gives specific requirements for the use and management of containers. In this case specific mention

Mr. J. Till Neville, Manager May 21, 1982 Page Three

is given to 265.176 which states that containers holding ignitable or reactive wastes be located at least 15 meters (50 feet) from the facility's property line. If this type of waste is anticipated at your proposed drum storage area, these requirements will have to be met thereby requiring establishment of a new drum storage area.

11. Annual/Quarterly Reports (R9-8-1821 H. and 40 CFR 265.75) Both regulations deal specifically with format and requirements for the Annual/Quarterly reports. Enclosed you will find an instruction sheet for these reports which should answer questions regarding deficiencies in your latest submission.

The proposed compliance date for the above-listed deficiencies is thirty-five (35) days following receipt of this letter. Evidence of compliance (plans, reports, etc.) must be submitted to the Bureau by that date. Should circumstances arise making this deadline unattainable, please notify the Bureau as soon as possible.

If you have any questions or if I may be of any assistance please contact me at 255-1160.

Sincerely,

Ted Blackburn

Environmental Health Specialist

TB:ct Enclosures

Innical Support Section

E.P.A. Region IX



ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

REF: TS 0467

April 21, 1982

BRUCE BABBITT, Governor JAMES E. SARN, M D., M.P.H., Director

> Neville J. Till, Manager McKesson Chemical Company P O Box 14799 Phoenix, AZ 85063

Re.: Glendale Facility (EPA ID No. AZDO43848993)

Dear Mr. Till:

This letter constitutes a formal request by the Department for a complete hazardous waste facility permit application (U.S. EPA "Part B") for the facility referenced above. This request is made under the authority of ACRR9-8-1820.A.5.c.

Enclosed please find a copy of the "Application Instructions" including a "Permit Application Form" and a set of application checklist "Modules" which are appropriate for your facility type. "A completed application must be submitted by October 18, 1982.

In order to ease your regulatory burden, the Department intends to work closely with the EPA in order to issue your facility a joint EPA/State permit. In order to accomplish this within a reasonable period, the Department will accept a copy of the completed EPA "Part B" application submitted to the U.S. EPA in lieu of an application arranged according to the Department's application "Modules". However, any application submitted to the Department must include those informational items required by the Department but not necessarily required by the EPA. This would include complete information regarding those EPA exempted processes such as elementary neutralization, NPDES and pretreatment units.

In order to facilitate the dissemination of information regarding State and Federal application requirements and processing procedures, you are invited to a meeting with representatives from the Department and the EPA. This meeting will be held at 10 a.m., Tuesday, May 4, 1982 at the State Health Building conference room A. Representatives from other solicited facilities will also be in attendance.

Should you have questions concerning this matter, feel free to contact me or Dale Anderson at (602) 255-1166.

Sincerely,

Olan Z. Roccler
Alan L. Roesler, R.G., Manager

Technical Support Section
Bureau of Waste Control

ALR:DA:ze

The Department of Health Services is An Equal Opportunity Affirmative Action Employer. All qualified men and women, including the handicapped, are encouraged to participate.

REF: "HW-0559"



ARIZONA DEPARTMENT OF HEALTH SERVICES

Division of Environmental Health Services

January 19, 1981

BRUCE BABBITT, Governor

Dean Applicant:

Your Resource Conservation and Recovery Act facility Part A application has been neceived. Pursuant to the Arizona State Hazardous Waste Regulations (fitle 9, Chapter 8, Article 18), you are hereby granted temporary approval to operate (R9-8-1820.H.1.). Temporary approval to operate will be in effect until a final administrative decision is made to approve or disapprove your complete hazardous waste permit application (R9-8-1820.A.5.e.).

Under temporary approval to operate, you are required to comply with the same requirements imposed upon a permitted facility relating to: (1) containers and storage tanks (R9-8-1817); (2) the hazardous waste manifests (R9-8-1818); and (3) the operation of a hazardous waste facility (R9-8-1821). You are also required to use the Federal Interim Status Standards (40 CFR Part 255) as specific conditions to meet these State regulations.

If we can be of any assistance, please contact Bill Williams, Manager, Hazardous Waste Section at (602) 255-1160.

Sincerely,

Tibaldo L. Cáñez. Chie

Tibaldo L. Cáñez, Chief Bureau of Waste Control

TLC:jr

LIST OF COMPANIES THAT RECEIVED LETTER REGARDING TEMPORARY APPROVALS TO OPERATE

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Motorola Inc. (Mohave St. Facility) Nick Hild, Mgr., Environmental Affairs P.O. Box 2953

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Phoenix, AZ 85036

AZD043848050

Chait, Maurice, Chief, Eng. Env. 2200 W. Broadway Mesa, AZ 85202

AZ489009018
Phoenix Substation (Headquarters)
Onstad, David, District Manager
P.O. Box 6457
Phoenix, AZ 85005

AZTO00618512
Motorola Inc. Govt. Electronics Div. Kistler, Thomas, Env. Engineer, P.O. Box 1417
Scottsdale, AZ 85252



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street San Francisco, Ca. 94105

Mr. Neville J. Till, Manager McKesson Chemical Co. P.O. Box 14799 Phoenix, AZ 85063

Re: Glendale Facility (EPA ID No. AZD043848993)

Dear Mr. Till:

This letter constitutes a formal request for Part B of your application for a hazardous waste facility permit under the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. This request is made under the authority of 40 CFR 122.22(a)(4).

Enclosed for your reference is a list of the items which constitute Part B. Also enclosed is a copy of the relevant sections of the Federal Register explaining each item. Part B must be filed by October 15, 1982. Two copies should be submitted to EPA (M-5), at the address above. Two copies should be submitted to the Bureau of Waste Control, Arizona Department of Health Services, 1740 W. Adams Street, Phoenix, Arizona 85007.

We are scheduling a pre-application meeting for RCRA permit applicants in your area in the near future. You will be contacted regarding the time and location of this conference. The guidance you will receive at this meeting will speed the permitting process, so we urge your attendance.

Please refer any questions you may have to Mr. William D. Wilson (T-2-2) at the above address or phone (415)974-8391.

Sincerely yours,

David S. Mowday
Acting Director
Toxics & Waste Management Division

Enclosures

cc: Al Roesler, ADHS



ARIZON. DEPARTMENT OF 1. ALTH SERVICES

Division of Environmental Health Services

BRUCE BABBITT, Governor

JAMES E. SARN, M.D., M.P.H., Director

April 27, 1982

EPA ID No.: AZD043848993

Neville J. Till, Manager McKesson Chemical Company P O Box 14799 Phoenix, AZ 85063

Dear Applicant:

A Resource Conservation and Recovery Act Part A Application has been received by the State for your facility referenced above. You are hereby granted temporary approval to operate pursuant to Arizona Code of Rules and Regulations, R9-8-1820.H.1.

Your temporary approval to operate will be in effect until final administrative action is taken to deny or approve your permit application submitted pursuant to R9-8-1820.A-5-C, or when your Part A application is voluntarily withdrawn or returned by the State because a permit is not required for your hazardous waste activities.

Under temporary approval to operate, you must comply with the same requirements imposed upon a permitted facility including: 1) R9-8-1817 (Containers and Storage Tanks); 2) R9-8-1818 (Hazardous Waste Manifest); and 3) R9-8-1821 (Operation of a Hazardous Waste Facility).

In addition, where State standards for facilities are less stringent than federal regulations, or more broad or general, you are required to follow relevant EPA standards as detailed by 40 CFR Part 265.

If we can be of any assistance, please contact Alan Roesler, Manager, Technical Support Section at (602) 255-1166.

Sincerely.

R. Bruce Scott, P.E., Chief, Bureau of Waste Control

RBS:ze

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Foremost-McKesson Chemical Group Western Region 9040 Telegraph Road Downey CA 90240 213 869 2481

RECEIVED

MAY 21 1981

May 19, 1981 📶

MCKESSON CHEMICAL CO. FROENIX, ARIZONA



Region IX
Hazardous Materials Branch
Environmental Protection Agency
215 Fremont St.
San Francisco, CA 94105

Gentlemen:

Enclosed are closure plan statements covering the following location in your jurisdiction.

Tucson, AZ	ID# AZD045809019
Los Angeles, CA	ID# CAD020745246
Phoenix, AZ	ID# AZD043848993
Tustin, CA	ID# CAD061601019
Union City, CA	ID# CAD073934903

As these figures are approximate, in actuality our branches are instructed to move recyclable material to proper recycling plants as soon as they accumulate the minimum number of drums required by the recycler. In most cases we would not hold the material for 90 days.

We feel this covers our position, but if additional information is required please contact us.

Sincerely,

Bill R. Crumm, Sr.

BURE

Assistant Regional Operations Manager

BRC: sw



Closure Plan

Storage Facility

The McKesson Chemical Company Branch located at 4909 W. Pasadena Ave. Phoenix, AZ 85301 is registered as a storage facility. In fact, it is only a point at which the Company accumulates materials received from customers, which might otherwise be deemed hazardous waste, which are destined for transportation to a recycling facility.

This facility will continue to operate for as long as it is deemed economically viable by the Company and so long as its operation is otherwise permitted by applicable law.

All storage of regulated materials will be in approved, portable containers of a capacity of 55 gallons or less. When and if closure occurs, it will be accomplished by transporting all such stored material on hand to an approved recycling or other treatment or disposal facility.

It is presently contemplated that the maximum amount of such material on hand would ______ for_____ drums.

It should be possible to complete closure within a maximum period of one week and based on current transportation costs for the estimated maximum amount of material that might be on hand at any one time, the total cost of closure should be approximately \$ 5,000.00 -

Since no processing or transfer of this material is contemplated, other than the clean-up of any spill or leak that might conceivably occur (and for which there are contingency plans), no costs for decontamination, monitoring or other such closure procedures should be incurred.

In view of the foregoing, no post closure care would be required for this facility and no post closure plan will be prepared.

McKesson Chemical Company.
Foremost-McKesson
Chemical Group
Western Region
9040 Telegraph Road
Downey CA 90240
213 869 2481



May 19, 1981

Region VI United States E.P.A. First International Bldg. 1201 Elm St. Dallas, TX 75270

Gentlemen:

Enclosed is the closure plan statement covering our Albuquerque Branch I.D. # NMD080370786.

We feel this covers our position, but if additional information is required please contact us.

Sincerely,

McKESSON CHEMICAL COMPANY

Bill R. Crumm, Sr.

RU P. CALL

Assistant Regional Operations Manager

BRC:sw



Closure Plan

Storage Facility

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This facility will continue to operate for as long as it is deemed economically viable by the Company and so long as its operation is otherwise permitted by applicable law.

All storage of regulated materials will be in approved, portable containers of a capacity of 55 gallons or less. When and if closure occurs, it will be accomplished by transporting all such stored material on hand to an approved recycling or other treatment or disposal facility.

It is presently contemplated that the maximum amount of such material on hand would ______ 30 .____ drums.

It should be possible to complete closure within a maximum period of one week and based on current transportation costs for the estimated maximum amount of material that might be on hand at any one time, the total cost of closure should be approximately \$ 3,000.00

Since no processing or transfer of this material is contemplated, other than the clean-up of any spill or leak that might conceivably occur (and for which there are contingency plans), no costs for decontamination, monitoring or other such closure procedures should be incurred.

In view of the foregoing, no post closure care would be required for this facility and no post closure plan will be prepared.

DESCRIPTION OF THE PROPERTY OF				LOCATION SUSEVIX	,
REMOST-MERESSON CHEMICAL CROUP				INSPECTED BY JOHN C	
ECKLIST #1 (ALL PACILITIES)					
is checklist is to aid in the audit and o	orrection of s	standards necessai	ry to:	REVIEWED WITH HILE A	
Maintain a safe and healthful workplace.	- • • • • • •			DATE <u>2/17/82</u>	
Comply with applicable governmental regul Promote Foremost—McKesson's image to our	ations. employees, the	public, our cus	tomers, and our suppliers.	ì	
Assume quality and diminish liability. Assume the protection and maintenance of	owned and lear	sed equipment, as:	sets and property.		
Control losses related to fire, spills, s	ecurity and li	lability.			
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6. Set and floors			 McKesson tachograph prograph place and conducted prope 		
7. Walls/windows/draperies/blinds			3. Drivers' physical exams,	road tests	
8. Furniture/Equipment			and chauffers' licenses o	surrent	
. ,	<u> </u>		B. EMERGENCY		
9. Lighting			4. Supervisory personnel fam		
10. Housekeeping/general appearance			with spill reporting requ of EPA and DOT.	al rements	
11. Furnace/air conditioner			5. Spill control procedures	in effect	
12. Restrooms/locker rooms well maintained and clean			and all spills promptly r to Region.	reported	
COMMENTS:					

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•	Relay	Stand	Exceeds	N/A			Below		iards Freeds	N/A
•		. R.C.CO		_1V V			DE LUM	nec us	Exceeds	TVA
rgency plans complete, written,					D. MAI	INTENANCE				• •
current for all potential ardous incidents of an		_			15.	Maintenance records detailed and				
gency nature.		/			-,.	kept current on trucks, trailers,				
						lift trucks and power sweepers;				
gency drills conducted						fleet PM program as in Ops Manual		~		
i-arrually (at least) and mented.	~					(Ref. 30.40) in effect and current.		<u> </u>		
					16.	Stationary equipment, i.e., boilers,				
at date conducted $7/80$						air conditioners, pumps, repack	•			
ncy telephone numbers posted						modules, scales, compressors,				
h phone; emergency alarm						conservents, measuring devices, hydrostatic testers, storage tanks,				
onal.	-	~				loading racks, etc., on a formal		_		
"outside" shipping papers						maintenance program and documented.		V		
CHEMIREC and current branch					10	Dandah Saran Amarah Aran a		•		
pency telephone numbers.					17.	Portable equipment, i.e., tools, testing devices, sealers, stencils				
						and marking accessories, etc.,		1		
ency response equipment ained; stored properly;						cared for and kept in place.				
ted monthly and documented.					••	· •				
•					18.	Supplies and repair parts properly stored and protected.		/		
ETION						stored and protected.				
fire department acquainted					e. <u>saf</u>	MY				
cility and products stored.		/			10	OSUA Pares 200 (Marie-1ana Value				
	5-/14/	20			13.	OSHA Form 200 (Workplace Injury and Illness Record) posted and				
The state of the state of	4 117					current.				
xtinguishers inspected	-									
y and documented.					20.	Safety records readily accessible				
cation(s) diagrammed and sted.						and more than one person knows where filed.				
p vou.			-			Mari V 144041				
tic aprinkler control					21.	One person clearly in charge of		,		
, air, and water pressure		./				safety and health activities.				
weekly.		<u></u>				a. Name of person HIKE BANGE)			
el trained and documented						The private files				
of fire extingulahers.										
- 1					,	/ -				
TS: B-7 Compact 2	21 CTG	ENCY	DRILL	24	4/1/	<i>52</i>				
	^	$\overline{}$. /		Susten drice for in		•	0	
14 Courset inc	BOCK	MES	T FI	CK C	*Tue	QUISHER_ DRILL FOR UN	TRAL	uso	its	aru
		,,,								

Stardards Bolow Meets Exceeds N/A 22. Safety Committee designated and functional; meetings morthly (at least) meetings documented. 23. One or more employees trained in first aid. 24. First aid kits fully stocked; inspected weekly and documented. 25. A nearty hospital, clinic or infirmary for medical care designated. 26. All accidents investigated; remedial action proposed and reported as per Operations Menual. 27. Maintenance Lock Cut procedures understood and implemented. 28. Protective equipment is provided as a needed; use is enforced; regular documented impections made for storage, care and word in the for thorage, care and word in the for the forest concentration of the propriet as appropriate and documented as appropriate as appropriate as appropriate as a documented as appropriate as approp				بحبوب								
functional; meetings monthly (at least) meetings documented. 23. One or more employees trained in first aid. a. Name(s) POBERT MITCHALL 24. First aid kits fully stocked; safety and documented. 25. A nearty hospital, clinic or infirmary for medical care designated. 26. All socidents investigated; remedial action proposed and reported as per Operations Manual. 27. Nainterance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and bondition. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and bondition. 29. Perimeter locks conform to Ope Narual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet.			Below			N/A			Below			N/A
23. One or more employees trained in first aid. a. Name(s) Collect HITCHELL 24. First add kits fully stocked; inspected weekly and documented. 25. A nearly hospital, clinic or infirmary for medical care designated. 26. All secidents investigated; remedial action proposed and reported as per Operations Manual. 27. Naintenance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and condition. 29. Perimeter locks conform to Ops Narual (Sec. 60.01); access to keys restricted; charged as appropriate and documented. 30. Keys to whiches, alarm systems, perimeter locks, etc., issued against receipts and, duplicates secured in a locked cabinet.	22	functional; meetings monthly		/	العا	82	31.			<u>~</u>		
adequate for operations and/or security; commented to timer or electric eye. 25. A nearty hospital, clinic or infirmary for medical care designated. 26. All socidents investigated; remedial action proposed and reported as per Operations Manual. 27. Maintenance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and continuous containers and shipping papers. 29. Perimeter locks confors to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 29. Perimeter locks confors to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and deplicates secured in a locked cabinet.	23	3. One or more employees trained		<u></u>	<u></u>		32.	cars left overnight closed and		· ~		
25. A nearty hospital, clinic or infirmary for medical care designated. 26. All accidents investigated; remedial action proposed and reported as per Operations Manual. 27. Maintenance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and condition. 29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and clocked cabinet. 21. Trucks and trailers secured overnight to protect to both contents and vehicles. 22. SHIPPINI 23. Shipping papers comply with DOT requirements for regulated chemicals, correctly identifying and describing hazardous materials and describing hazardous materials and escribing hazardous classes, RQ motations, and UN numbers). 36. DOT examptions (if required) on file and properly moted on containers and shipping papers. 37. C.O.D. procedures in compliance with Ops Manual (Sec. 60.01). Locked drop box in use. 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.		a. Name(s) ROBERT HITCHE	r.L				33.					
infirmary for medical care designated. 26. All accidents investigated; remedial action proposed and reported as per Operations Manual. 27. Mainterance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and mondition. 29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. 31. Shipping papers comply with DOT requirements for regulated chemicals, correctly identifying and describing hazardous materials (including hazardous classes, RQ notations, and UN numbers). 36. DT exemptions (if required) on file and properly noted on containers and shipping papers. 37. C.O.D. procedures in compliance with Ops Manual (Sec. 60.01). Locked drop box in use. 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	2	i. First aid kits fully stocked; inspected weekly and documented.		<u>~</u>				security; connected to timer or		<u> </u>		
remedial action proposed and reported as per Operations Manual. 27. Maintenance Lock Out procedures with DOT requirements for regulated chemicals, correctly identifying and describing hazardous materials (including hazardous classes, RQ notations, and UN numbers). 28. Protective equipment is provided as needed; use is enforced; regular documented inspections nade for storage, care and condition. 29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. 31. Shipping papers comply with DOT requirements for regulated chemicals, correctly identifying and describing hazardous classes, RQ notations, and UN numbers). 36. DOT exemptions (if required) on file and properly noted on containers and shipping papers. 37. C.O.D. procedures in compliance with Ops Manual (Sec. 60.01). Locked drop box in use. 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	2	infirmary for medical care		<u>~</u>	****		34.	night to protect both contents		<u> </u>		
reported as per Operations Manual. 27. Maintenance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and condition. 29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. 35. Shipping papers comply with DOT requirements for regulated chemicals, correctly identifying and describling hazardous materials (including hazardous elements). 36. DOT exemptions (if required) on file and properly noted on containers and shipping pape	2						0. <u>sau</u>	PPINO			<i>:</i>	
27. Maintenance Lock Out procedures understood and implemented. 28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and condition. 29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. 21. Secure of the first interval and duplicates secured in a locked cabinet. 22. Secure of the first interval interva				×			35•					
28. Protective equipment is provided as needed; use is enforced; regular documented inspections made for storage, care and shipping papers. 36. DOT exemptions (if required) on file and properly noted on containers and shipping papers. 37. C.O.D. procedures in compliance with Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	2			<u>✓</u>				chemicals, correctly identifying and describing hazardous materials		•		
regular documented inspections made for storage, care and condition. 36. DOT exemptions (if required) on file and properly noted on containers and shipping papers. 37. C.O.D. procedures in compliance with Ops Manual (Sec. 60.01). Locked drop box in use. 48. TRAINING 38. Safety and health training provided (and documented) for all employees perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet.	2									Y		
With Ops Marual (Sec. 60.01). Name of the second of the s		regular documented inspections made for storage, care and		<u> </u>			36.	file and properly noted on		<u>~</u>		
29. Perimeter locks conform to Ops Manual (Sec. 60.01); access to keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. Inched drop box in use. H. TRAINING 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	·. <u>s</u>	BCURITY					37.					
keys restricted; changed as appropriate and documented. 30. Keys to vehicles, alarm systems, perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. H. TRAINING 38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	2									×		
38. Safety and health training provided (and documented) for all employees requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.		keys restricted; changed as		/			H. TRA	INING				
perimeter locks, etc., issued against receipts and duplicates secured in a locked cabinet. requiring such training, i.e., repackers, liftruck operators, drivers, warehouse personnel, etc.	3	••					38.					•
		perimeter locks, etc., issued against receipts and duplicates		✓				repackers, liftruck operators,		V		
		:						a. All planned meetings documented	· <u> </u>	\overline{Z}		

COMMENTS:_

	Below	Stand	Exceeds	N/A			20100		Exceeds	177
		- RCC U-0	-Access	IV A			Deton	nec us	ERCCOR	N/A
All persons involved in the handling	3				I. WASTE					
of chemical products understand the toxic and physical hazards of such					<i>lu</i> s. 1	f hazardous waste (H/W) generated				
products.		_				r stored:				
Responsible person(s) understand						. H/W stored only in designated				
and implement proper procedures					•	area (as shown on application)				
in handling and offering for						in proper containers, properly				
disposal both empty non-hazardous and hazardous containers.		V				marked, properly contained, and under environmentally				
						acceptable conditions.		~		
All persons are fully trained and documented in all appropriate					•	. Weekly inspection of H/W			نتجيبية.	
aspects of the job they perform.		V			'	containers and documented.		V		
Defensive driving classes con- ducted annually and documented.					•	. Personnel handling H/W trained and documented on such handling.		✓		
						an anamion of som immine.				
Porklift operators trained and		/			(. Records current on all H/W				
given operators' certificates.						movement, receipt, storage, disposal, and reporting.		V	-	
Respiratory equipment (respirators,										
gas masks, self-contained air						. Branch properly registered for		./		
packs, hose supplied face masks, emergency escape breathing						specific wastes handled.		<u>_v</u>		
devices, etc.):					1	. Hazardous wastes not mixed with				
						non-hazardous wastes or other		/		
a. Personnel trained and docu- mented in the use, care, and		,				producta.				
fitting for each type used.		_			1	. Waste analysis on hand for all				
h Unithan namadana dan asah						waste streams stored.		<u>v</u>		
b. Written procedures for each type available to personnel.					1	. H/W manifests comply with		,		
•					•	RCRA/DOT.		V		
c. Inspected monthly and		/				Inthial phinnants of 4488				
documented.		<u> </u>				. Initial shipments of different H/W to disposal or recycling				
d. Cleaning, repairs, disposal and						first cleared with Regional		./		
replacements when needed, are		/				RCRA coordinator.		<u></u>	-	
promptly and properly done.										

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			Stand	larda					Chand		
	•	Below		Exceeds	N/A			Below	Stand Meeta	Exceeds	NA
16.	As applicable, branch has received proper EPA identification number(s) as H/W transporter, generator, or T/S/D facility.		<u>~</u>			49.	Material held pending freight claim in protected and compatible storage; disposition of claim not unduly long; freight claim pro- cedures follow Ref. 40.10 in				
7	If a permitted T/S/D facility:						Operations Manual.		_		
	a. Energency plans comply with EPA requirements.		V				ELLANEOUS				
	b. Closure plans prepared and readily available.		V			50.	Bulletin board adequate and well organized.		<u>V</u>		
	c. "Danger - Unauthorized Personnel Keep Out" signs posted on gates (entry).		<u> </u>			51.	Company rules, General Safety Policy, Vehicle Safety Practice, evacuation diagram, OSHA and other state and federal posters promi-				
	d. Documentation showing emergency plans, layout, etc., submitted						mently displayed where all employees are likely to see them.		<u> </u>	<u>;</u>	
	to local emergency services. e. Pacility management understands				<u> </u>	52.	Current Material Safety Data Sheets on hand for all products stored at branch.		<u> </u>		
	RCRA requirements and responsi- bilities for proper handling of hazardous wastes.		✓			53.	Operations Manual kept current and available to all personnel needing it as a resource in				
	 Job description for personnel handling H/W prepared and on hand. 		✓				performing their job functions. a. Other manuals in use, i.e.,		<u></u>		
	g. Operations (inspection) log per RCRA requirements maintained						Dow Stewardship, duPont Reythm, DOT Tariff, etc., kept current and readily available as				
	and current.		<u> </u>	-			reference.		<u>v</u>		
ō.	There is a general avareness and effort to minimize wastes generated at this facility.		<u>√</u>			54.	Personnel aware of procedures to follow if visited by government inspector.		<u> </u>		
	1					55.	Roof inspected arranally.	,			
r	OMMENTS.						a. Date of last inspection//	81			

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	•	Dollars	Stand		WZA			Bal		ards	N/A
		DETON	meet8	Exceeds	N/A			DETON	meet8	Exceeds	NA
(Procedures, storage and dispensing of fuels (LP gas, gasoline, dissel) in accordance with standards.		_			5.	Warning signs posted that chocks must be used and lift trucks must be clear of truck and dockboard before removing.		V		••
ŧ	Pank trucks/trailers inspected and tested in compliance with DOT par. 173.33 and 177.824.		<u> </u>			6.	Disconnected trailer supported under the mose against frame (not floor) when loading or unloading.	<u> </u>			
1	"Good Manufacturing Practices" (GMP) as outlined in Operations Manual Ref. 40.62 in effect.					7.	Staging or make up area set aside and utilized.		<u>~</u>		
	Facility management personnel familiar with DOT Accident Reporting Regulations as outlined					8.	Safety shower/eyewash (if any on dock) in proper condition and unobstructed.				<u>v</u>
	in Ref. 30.61 in Operations Marual.		_			9.	"No Smoking" and safety signs prominently posted and adhered to.		<u>~</u>		
	Results of most recent security, insurance, government, etc.,					10.	Housekeeping neat and orderly.		V	·	
	inspections available; positive action completed or initiated.		✓			11.	Balcony/mezzanine used for storage marked as to load capacity - has				./
ľ	III. WAREHOUSE/DOCK						rails and toe board.				
	McKesson compatibility storage and coding program in place and properly implemented.		✓				Sufficient exits offer egress to the street.		<u> </u>		
	Truck/rail dock plates kept in serviceable condition and secured to prevent alipping when in use.		<u>~</u>			13.	All exits unobstructed and marked with a properly illuminated sign and kept unlocked while people at work. (OSHA 1910.37(q) - "Every exit sign shall be suitably illum-				
•	Dock bumpers in serviceable condition.						inated by a reliable light source giving a value of not less than 5 foot-candles on the illuminated				
	Chocks available and used to prevent truck movement when lift trucks enter.		<u> </u>			14.	aurface".) Lighting adequate.	<u>v</u>	\overline{Z}		
0	MENTS: IH-6 Terillay (Curc	Exit	Sugar	101.729	e with	y follow - will fire	lins C	یک ہ	Grow	VB
_							SECURING PRICE FOR				
1							NG bock NOT WORKING				
	-13 ENDI SIGN AS	WE-	WISE	. 000	- 70	COPIE	NO OCK NOT EUCHENNY		1-711	- 7	-/-

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 15. Switches and switch panels marked and unobstructed. 16. Inventory stacked neatly a ely. 17 SP and Food items in segr 	clearly V	N/A 27. Pallet racks in good con and secure.	Standards Below Meets Exceeds	_IVA
marked and unobstructed. 5. Inventory stacked neatly sely.	<u> </u>			
ely.				
TO and Book I been in seem		28. Battery charger area wel lated and away from open or other ignition source	n lighta	✓
storage.	regated	29. Forklifts, sweepers, oth	her equip-	
. Food and USP items on cles dedicated pallets.	m	ment have good appearance leaking; forklift capaci on the machine.		
Products stored away from (minimum 4").	walls	30. Overhead racks in place forklifts.	on	
. Alaleways marked.	<u> </u>	31. Forklift equipped with i	fully er.	
. No pallete or products etc aislemays.	red in	32. Pire extinguishers mount readily accessible locat	ted in	- Little
 No evidence of leakage or bags remaining. 	broken	throughout the warehouse		
 Storage of broken contains freight claim protected ar compatible. 		33. Signs provided high above stock to point out the life extinguishers, hose	location of	
 evidence of poor sanite _ard or rodent droppings. 		34. Fire doors, extinguisher fire hoses unobstructed.		distribution.
Ploors free from buildup of rubber, oil or grease, che spills or condensate. Sar	emical nd used	 Extinguishers tagged sho recharge date, maintenar initials, etc. 		
for traction (clay used or absorb puddles and prompt) swept up).		36. Automatic sprinkler week on control valves, air a pressure documented on c	and water	E011BIT 12/1/81 Page 7 o
 Pallet rack properly utili no evidence of overload ar as to capacity allowed. 		location. 37. Adequate clearance main	tained	g
no evidence of overload ar as to capacity allowed.	nd marked			g

									•			
		Below	Stand Meets	ards Exceeds	N/A			Be) cer	Stand	ards Exceeds	N/A	
38.	Warm room properly utilized and neat and exhaust fan functioning properly; door properly seals.		V			4.	Sprinkler (outside) shutoff valves locked open.		<u></u>		<u>-N.T.</u>	
39.	Walls, trusses, and supports (especially metal buildings) are kept free of dust and forklift/					5.	Waste receptacle (used for periodic trash removal) away from building or flammable products where possible spontaneous combustion	1				
	pallet impact.						can spread; not used for hazardous waste.			<u></u>		
	Wall and ceiling insulation (if any) in place and neat.				_	6.	No accumulation of junk, old drums, trash, etc.		V			
1.	Truck and/or rail door seals in good repair.				×	7.	Products and empty drums stacked in a neat, orderly and compatible					
42.	Box cars cleaned after emptying.				×		manner at a safe height; surplus and broken pallets segregated		,			
13.	Rail cars properly chocked when entering with lift truck.			*****	×	۵	and stacked neatly.		<u>~</u>			
	Trash barrels emptied daily.		<u> </u>			0.	Compressed gas cylinders secured in an upright position; protected from sun and away from flammables.		/			
	Portable electric tools grounded or double insulated.		V			9.	(In snow areas) storage arranged for best access of snow removal					
6.	Wall and ceiling vents are wire covered to prevent entry of birds and rodents.		/			10.	equipment. Condition of pavement (pot holes,				<u></u>	
	I IV. YARD						settling, etc.)	V				•
1.	Ramp in safe condition, free of grease, ice, etc; rails CK.		W			11.	Unpaved portion of yard free of weeds, standing water.		~			
2.	Siding kept clean of spilled chemicals or sweepings from box cars.		<u></u>				Condition of fence (free of holes, standing straight; no evidence of entry; gates easy to operate).				*****	12/1/81 Page 8
3.	Track and rail bed maintained; straight with ample ballast; good drainage.		<u> </u>				No containers or pallets stored near enough to the fence to allow their use for attempted entry or exit to yard.	<u>~</u>				6 5
COI	MMENTS: IV-10 Suami	TRI	193	u por	grejEc	TIENS	APPROVAL FOR REPAIR	تعزاء سا	ASS	SICT 1	4018	- Ey
	IV-IV SECURE COST	FOR	- 12	THIR I	FE	ring	plant BIRL Nach	- By	, 4,	1/82		
_1	V-13 DRUMS STORED	NEA	m p	Esce	ox	Lute	Sipe OF YARD (BY	WASI	4 AR	(A) P	Greve	e Bo
											21	2.1

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		Below	Stand	erds Exceeds	N/A			Below	Stand	lards Exceeds	N/A	
14.	Ruel pump locked when not in use.		<u>✓</u>			გ.	Unloading platforms safely located (and protected from accidental					
5.	Planmable drums stored in quantity groups per OSHA maximums; away from buildings and truck traffic.		<u> </u>				collision); structurally sound; mechanically safe and properly operating; clean, neat; has hand rails, toe boards, etc.		V			
	Appearance of drums and labels; no evidence of leakers.					26.	Outside truck dockpits:					
7.	No evidence of spillage that						a. Free of standing water.				V	
-	might result in EPA or other regulatory censure.		<u> </u>				b. Drain (sump pump) functions.				V	
8.	"No Smoking" and other safety aigns prominently displayed.						c. Dockboards, bumpers, and ladders in good condition.			-	<u></u>	
9.	Pallets in service in good condition.		<u> </u>				d. Safety requirements (chocks, handrails, signs, etc.) in evidence.	Y		:	WA	
0.	"No Trespossing" signs posted.		Y			27.						•
1.	Hesardous waste products held					-, -	and functioning.		V		*******	
	pending removal to disposal site or to be recycled neatly contained;	;				SECTION	V. TRANSPORTATION					
4	isolated from other product storage; no evidence of leakage; containers properly marked.		<u>/</u>			1.	Tractor appearance clean inside; paint and signs in good condition- upholstery not torn, etc.	<u> </u>	-			
2.`	no svidence of urmarked con- tainers which may need analysis for identification.		<u> </u>			2.	Straight trucks (including panel trucks and pick-ups) clean inside; paint and signs in good condition;		./			
3.	Recovery (salvege) drums not used for purposes other than handling						mudguards, no holes in floor, etc.					3 H M C
	leaking drums; stored upside down to prevent collection of water.		<u></u>			3.	Tachographs and speedometer on all motor units in place and functioning.		V		-	CHEM OF EXCHIBIT 12/1/81 Page 9 of
.	During unloading or hook-up rail cars and chocked (with brakes set); derails and warning signs used.			_		4.	Tractors and trucks carry fully charged fire extinguishers - 10 1b. BC type.	/				of 10.90
CC	MMENTS: IV-26 Justice	ut j	CERS	ovvec	70	C-660. 1	wither on our C	HLR	ne-	PRIKE	9- 1	
_	During Filling	16 0	PERA	rine +		MUSI	ATLEY; V-1 CLEAN	VINS	IDE	OF C	AB.	mo fe
	SENT Custines on	72	uk	# 17	1815	- 11-4	INSPECT & DOCUMENT	TRUC	K E	12 m	mittll	11 - 18110

						· •
		Below	Standar Meets I		N/A	Standards Below Meets Exceeds N/A
5.	CHEMINES is posted on desh or inside door.		<u>~</u>			•
6.	Other emergency equipment - spare fuses, warming devices, etc.		V			
7.	Sleeper cab clean and orderly.				V	
	Trailer appearance: side racks					V-8 Side Rocks on TRAILER # F- 777085
	and van sides in no need of repair; no holes in floor; paint and signs in good condition; mudguards in plade; adequate placard holders, etc.	✓.				V-8 S. OF RACKS ON THREET 12-171085 EXTEND BEYOND LEGIN WIDTH LIMITS. CORPECT BY 2/26/82
9.	Tank trailers, tank wagons and cargo tanks (portable and akid) appearance good; insulation ok; have no protuberances extending beyond overturn protection; certification plate in place.		<u> </u>			
10.	a. Test date shown on tank(s) Solvent Tanker 101 Chicker Tanker 9/ Lift gates maintained and in good operating condition.	182	skio V	TANK	ris 9/2 	22/8/
	T/T hoses capped and frequently inspected for signs of deterioration.		×			Since THE ONLY ON THE
12.	Tires meet minimum tread depths (front 1/8", rear 1/16").	_Y				V-12 RIGHT-INSIDE TIRE STREETH ON THE STREET
13.	McKesson decals and ID number on all units and in good condition.	_				By 2/26/82 5 8.
,						V-13 STENCIL MYKESSON EQUIPMENT NUMBER

on vivis # 771542 4 773892 By 2/26/82

FOREMOST-MOKESSON CHEMICAL GROUP

CHECKLIST #2 FOR ALL LIQUID REPACK FACILITIES

This checklist is to aid in the audit and correction of standards necessary to:

- Maintain a safe and healthful workplace.

- Comply with applicable governmental regulations.

- Promote Foremost-McKesson's image to our employees, the public, our customers, and our suppliers.

- Assure quality and diminish liability.

re the protection and maintenance of owned and leased equipment, assets and property.

rol losses related to fire, spills, security and liability.

INSPECTED BY JEHN GOMEZ REVIEWED WITH HILE BANGO DATE 2/18/82	
Standards Below Meets Exceeds N/A	
roper ied, nted.	

			Stand						Stand		
CTIO	I. GENERAL RECORDEEPING/CONTROL	Below	Meets	Exceeds	N/A			Below	Meeta	Exceeds	N/A
1.	Repack Instruction Sheet (RIS)					4.	Chemical transfer hoses of proper type for service and identified,		,		
	a. Program properly implemented.				_		inspected monthly and documented.				
	 RIS sheets on hand for all products and package sizes and grades repacked. 				<u>/</u>	5.	Repacking branches/production facilities are packaging only those potherization to be a second		/	:	
	 File of past sheets retained for documentation. 				<u>/</u>	6.	Office authorization is given. Label order control; stock levels; disposal and storage of labels				
	 Comments from repack operator followed up and noted on RIS sheet. 						in accordance with Ops Marual (Sec. 20.30); only approved labels used.		V		
	Written procedures on hand and readily available to all personnel for all repack processes, including bulk loading and unloading, washing, drumming, bagging, etc.		<u></u>			7.	USP/FCC production/repack in compliance with FDA and State standards, including lot control and recordkeeping as well as dedication of equipment.				¥
3.	Each fill run inspected and signed off by-supervisor or designate on job ticket <u>prior</u> to releasing to stock or shipment.		<u>v</u>			8.	Repack samples obtained (and retained) as per Ops Marual (Sec. 20.20). Written sample procedures (differing from above) provided and followed for dry repack, USP/FCC items, etc.		<u> </u>		
CO	MMENTS:										

			Stand	ards					Stand	ards'	
	•	Below		Exceeds	N/A			Below		Exceeds	NA
9.	Supervisor checks procedures, hook-up, labels, stencils, con- tainers, exhaust system, and protective equipment before						c. Personnel understand <u>only</u> specific authorized compatible chemicals may be released to pit.	•	<u>✓</u>		
	authorizing "go shead" on fill run; inspects each fill run before signing job ticket and releasing to stock.		<u> </u>				d. Only supervisor authorizes release of material to sewer after confirming neutralization.		<u>/</u>	-	
).	Scales check tested before daily use and certified within past aix months. a. Test date(s)		<u>/</u>			15.	When compressed air is used to unload T/T or T/C, written procedures are in effect and adhered to.		· 		
•	At least two people always in attendance during repack, bulk loading or unloading; no repack, loading or unloading, is ever		./			16.	Empty T/T or T/C unloaded by compressed air is depressurized slowly under control (except compressed gases).		<u>√</u>	,	
	left unattended. Returnable containers in adequate supply.		<u>v</u>			17.	When pressurized with compressed air, T/T or T/C is not allowed to remain under pressure when				
	Air driers, conservents, filters,	-					not attended (except compressed gases).				
	emergency relief valve(s) pro- perly functioning and period- ically inspected and documented.		V	******		18.	T/C and storage tanks are disconnected when not attended.		<u> </u>		
•	If a neutralization pit at facility:					19.	McKesson Lot Number procedure in effect.		1		
	 Disposal records properly maintained and initialed by supervisor. 		<u> </u>		-	20.	Proper controls in effect to account for revenue from sales of used drums, scrap metal, and acrap valves.		✓		
	 Commercial analysis of typical batch maintained for possible regulatory review. 		✓								
ΩМ	MENTS:										

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•	Standa					-		ndards		
	Below Meets	Exceeda	N/A			Below	Meets	Exceeds	N/A	
PHTSICAL LAYOUT/BRUIPMENT				11.	Extension cords (and receptacles) three-prong type.		<u>\</u>			
 Area around shelter clear for emergency egress. 				12.	(In Flammable Solvent area) electrical equipment of type					
Shelters maintained, clean and organized; corrosive shelter floors coated for protection.					Class I Group D (explosion proof) in good condition (no cord appliances); spark-proof tools used.		Y			
 Ventilation adequate to minimize fume build-up or concentration. 				13.	Grounding system in acceptable condition utilizing 8' copper					
 Safety shower and eye wash facilities functioning and unobstructed in shelter. 	_ <u>~</u>				rod or water line; connections tight and continuous; clamps tight and positive		K			
Electrical switches/penels clearly marked and unobstructed.				14.	Grounding system being used properly.		V			
All electrical receptacles properly covered.				15.	Modules (automatic fill control units) fully operable and maintained in good condition.		V			
 Switches and junction boxes located away from wet or damp places or safety showers and faucets. 				16.	Exhaust fans, fume hoods and vent hose operable and appear in good condition.		<u>~</u>			
Conduit securely attached to supports and outlet boxes away	. 4				Conveyors stable and maintained.			\checkmark		
from walking areas.		<u> </u>		18.	Test weights on hand for daily check test of scale(s).		V			
 No flexible or extension cords used as permanent wiring. 			¥	19.	Draining of transfer hose and				-	
10. No extension cords frayed or spliced.			Y		module controlled into containers and not into dike area.		\checkmark			
•				20.	Returnable containers filled from a "ready" pile of pre-washed/inspected containers.		<u> </u>			

			Stanc					Standards			
	·	Below	Meets	Exceeds	N/A			Below	Meets	Exceeds	N/A
•	No large backlog of containers to be washed.		<u> </u>			33•	Discharge pipes of storage tanks terminate inside dike.			\checkmark	· <u>•</u>
•	Neutralization pit covered or has a safety rail.		/			34.	Pipe lines and tanks identified.			<u> </u>	
•	Pit liner in good condition with no evidence of seepage or leaking.		<u></u>			35•	No lines exposed to freezing that cannot be drained.		\checkmark		
١.	Means of adding neutralizing		<u></u>			36.	Storage tanks neat appearing and maintained.			\checkmark	·
5.	aclution adequate and safe. All closures properly inspected		Y		*********	37•	Storage tank measurement gauges properly functioning.			\checkmark	
5.						38.	Metal tanks all statically grounded.		_		
) _	inspected on composite drums. Ventilation/exhaust at wash rack		V			39•	Tank ladders above 18 ft. caged.				✓
•	adequate to protect employee from fumes.		_			40.	Heated tanks function with complete insulation; temperature			✓	
3.	Tank storage areas adequately diked.		\checkmark			41.	gauges. Venting presents no problem of				
).	Dike in good condition without cracks or open outlets; drain						toxic concentration, odor or visible plume which might result in EPA censure.		\checkmark		
	valves closed. Product storage within dike					42.	Heat sources compatible for area and safety devices frequently		,	1	
	compatible.						checked.				
1.	No evidence of line and hose drainage; or dripping from valves.					43.	Pixed lines run from T/T or T/C to shelter for all direct filling of hazardous materials.		V		
2.	Walkneys and stiles provided to avoid stepping on pipes.					44.	Exhaust scrubbers functioning properly.		<u> </u>		

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Standards Below Meeta Exceeds N/A 85. Pages appear maintained; no indication of base corrosions seal lesings; more clean. 86. Themselve house capped when not in use. Inhound driver marning/ instructional signs posted at fill lines. 87. Startey equipment: 18. Pages appear maintained; no indication of base corrosions with financial signs posted at fill lines. 88. Pages and thirmers stored at fill lines. 89. Spray paint booth and equipment is proper and adequate; exhaust system functions; no undue builday of paint overspray. 89. Air reserver dustand of condensate particularly cleaned. 89. Air reserver dustand of condensate particularly cleaned. 89. Air server dustand of condensate particularly cleaned. 80. Air server dustand of condensate particularly cleaned. 81. Asfety guard on compressor butter of condensate particularly													
indication of base corrosions seal leakage; motor clean. **S. Trensfer hoses capped when not in use. **Inhoust deriver warning/ instructional signs posted at fill lines. **Inhoust deriver warning/ instructional signs posted at fill lines. **A. Paints and thinners stored **a. Readily accessible. **A. Spray paint booth and equipment is proper and adequate; estasuat system functions; no undue buildop of paint overlays. **55. Safety equipment: **A. Proper and adequate; estasuat system functions; no undue buildop of paint overlays. **56. Loading/unloading platforms in pool functioning condition; protected from entry evaluation; protected from entry		•	Below			N/A			Below			N/A	
in use. Inhound driver warning/ instructional signs posted at fill lines. 48. Paints and thinners stored safely. 49. Sprey paint booth and equipment is proper and adequate; exhaust system functions; no undue buildup of paint overspray. 50. Air receiver drained of condensate periodically and examined; safety valve functional; all filter periodically and examined; safety valve functional; all filter regularly cleaned and compressor belts and sign "Caution - This Reddine Starts Automatically" mounted in or beside compressor. 51. Safety equipment: 52. New and recorposed containers to be used for regards properly stored on side or upside dom with plugs tightered. 53. We wand recorposed containers to be used for regards properly stored on side or upside dom with plugs tightered. 54. COMMENTS: ### A New CHART AND INSTRUCT FUNCTION DEFINE ALLOW ALLOW AUGUST TO READ COMMENTS: #### ALSO MARK WHERE CHARLE AUGUSTALE **CHARL WHERES BEFORE Languing on Union DONG** **UNESC CARPS FOULD MARK UNION ON UNLORDING** **UNESC CARPS FOULD MARK UNION ON UNLORDING**	45.	indication of base corrosion-					53.	shelter not heavily etched; rinse-off hose fitted with soaker					
instructional signs posted at fill lines. 88. Paints and thinners stored safely. 89. Spray paint both and equipment is proper and adequate; exhaust system functions; no under buildup of paint overspray. 50. Air receiver drained of condemate periodically and examined; safety valve functional; air filter years and sign "Caution - This Machine Starts Automatically" mounted and sign "Caution - This Machine Starts Automatically" mounted and recoperate to be used for repack properly stored on side or upside doom with plage tightered. 51. Note that is and recoopered containers to be used for repack properly stored on side or upside doom with plage tightered. 52. New and recoopered containers to be used for repack properly stored on side or upside doom with plage tightered. 53. Note that without the compression. 54. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 54. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 55. Safety guard on compression belts and sign "Caution of the place, uncluttered and organized. 56. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 56. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 57. Safety guard on compression that the protection of the place of the protection of the place, uncluttered and organized. 58. Loading/unloading platforms in good functioning of functioning protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 59. Loading/unloading platforms in good functioning platforms in good functioning of functioning protected from moving vehicles; hardrails and too boards in place, uncluttered and organized. 50. Loading/un	46.			V				drips by deluging rather than		<u> </u>			
89. Spray paint booth and equipment is proper and adequate; exhaust system functions; no undue buildup of paint overspray. 50. Air receiver draftned of condensate periodically and examined; safety walve functional; air filter regularly cleaned. 51. Safety guard on compressor balts and sign "Cauton. This Nachine Tearts Automatically" mounted an or beside compressor. 52. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightened. 53. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightened. 54. COMMENTS: ##-47 Nucleus and unsame a	\. .	instructional signs posted at	<u> </u>					adequate, neat and proper.					
a. Readily accessible. 49. Spray paint booth and equipment is proper and adequate; exhaust system functions; no undue buildup of paint overspray. 50. Air receiver drained of condensate periodically and examined; safety valve functional; air filter regularly cleaned. 51. Safety guard on compressor belts and sign "Cutton - This Michine Starts Automatically" nounted an or beside compressor. 52. New and recoopered containere to be used for repaid from the with plugs tightemed. 53. New and recoopered containere to be used for repaid from with plugs tightemed. 54. Loading/unloading platforms in good functioning condition; protected from moving vehicles; handralls and toe boards in place, uncluttered and organized. 55. Loading/unloading platforms in good functioning condition; protected from moving vehicles; handralls and toe boards in place, uncluttered and organized. 56. Loading/unloading platforms in good functioning condition; protected from moving vehicles; handralls and toe boards in place, uncluttered and organized. 57. West and recoopered containere to be used for repaid from with plugs tightemed. 58. Loading/unloading platforms in good functioning condition; protected from moving vehicles; handralls and toe boards in place, uncluttered and organized. 58. Loading/unloading platforms in good functioning condition; protected from owning vehicles; handralls and toe boards in place, uncluttered and organized. 59. Loading/unloading platforms in good functioning condition; protected from owning vehicles; handralls and toe boards in place, uncluttered and organized. 59. Loading/unloading platforms in good functioning condition; protected from owning vehicles; handralls and toe boards in place, uncluttered and organized. 50. Loading/unloading platforms in good functioning condition; protected from owning vehicles; handralls and toe unclustered. 50. Loading/unloading platforms in good functioning condition; protected from owning vehicles; handralls and toe unclustered. 51. Safety guard on compressor. 5	48.	Paints and thirmers stored					55•	Safety equipment:					
is proper and adequate; exhaust system functions; no undie buildup of paint overspray. 50. Air receiver drained of condensate periodically and examined; safety valve functional; air filter 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardralls and toe boards in place, uncluttered and organized. 75. Safety guard on compressor belts and sign "Caution - This Machine That's Automatically" mounted an or beside compressor. 75. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightered. 75. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightered. 75. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightered. 75. New and recoopered containers to be used for repack properly stored on side or upside down with plugs tightered. 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardrall good functioning condition; protected from moving vehicles; hardrall sand toe boards in place, uncluttered and organized. 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardralls and toe boards in place, uncluttered and organized. 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardralls and toe boards in place, uncluttered and organized. 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardralls and toe boards in place, uncluttered and organized. 75. Loading/unloading platforms in good functioning condition; protected from moving vehicles; hardralls and toe boards in protected from moving vehicles; hardralls and toe boards in place, uncluttered and organized. 75. Loading/unloading hardralls and toe boards in place, uncluttered and organized. 75. Loading/unloading hardralls and toe boards in protected from moving vehicles; hardralls and				<u> </u>				a. Readily accessible.		_			
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50. Air receiver drained of condensate periodically and examined; safety valve functional; air filter regularly cleaned. 51. Safety guard on compressor belts and sign "Caution - This Machine Yearts Automatically" mounted in or beside compressor. 52. New and recompressor. 53. New and recompressor. 54. New and recompered containers to be used for repack properly stored on side or upside down with pluga tightered. 55. New and recompered containers to be used for repack properly stored on side or upside down with pluga tightered. 56. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 56. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 56. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 57. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 57. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 57. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 58. Loading/Autocating platforms in good functioning condition; protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 57. Loading/Autocating platforms in good functioning protected from moving vehicles; handrails and toe boards in place, uncluttered and organized. 58. Loading/Autocating platforms 59. Loading/Autocating platforms 50. Loading/Autocating platforms 51. Safety guard on compressor platforms 51. Loading/Autocating platforms 52. Loading/Autocating platforms 53. Loading/Autocating platforms 5		system functions; no undue		1				c. Clean and maintained.		\checkmark			
periodically and examined; safety valve functional; air filter yalve functional place, unclusted or particulated. yalve functional place, unclusted and organized. yalve functional place, unclus							56.	Loading/unloading platforms in					
and sign "Caution - This Machine Starts Automatically" mounted In or beside compressor. 52. New and recoopered containers to be used for repack properly stored on side or upside down with pluga tightened. COMMENTS: Hot 47 Purchast and instance trucks desired warring signs at Salvert? AND Acid Helds, Also make where Chales analyzable - Signs to Mean: Chale wheels Before loading on unleading. "Chale wheels Before loading on unleading." "Driver past attend while at all times while loading ar unleading."	50.	periodically and examined; safety valve functional; air filter	****	<u> </u>				protected from moving vehicles; handrails and toe boards in		<u> </u>			
COMMENTS: Hot 47 Provided town with plugs tightered. COMMENTS: Hot 47 Prince and instruct truck Driven warning Signs at Solvent? AND ACID THE AREAS, ALSO MAKE WHEEL CHOCKS AUALIABLE - SIGNS TO READ; CHOCK WHEELS BEFOIRE LOADING ON UNLOADING. "DRIVEN INUST ATTEND WHILE AT ALL TIMES WHILE LOADING ON UNLOADING."	. 51.	and sign "Caution - This Machine Starts Automatically" mounted		<u>√</u>									
"CHAR WHELS: BEFORE LOADING ON UNLOADING" "DRIVER TRUST ATTEND WHILE AT ALL TIMES WHILE LOADING ON UNLOADING. "WERE CONFIT FOULDMENT WHEN LIANING ON UNLOADING."	52.	to be used for repack properly stored on side or upside down		<u> </u>									2 age 5
"CHAR WHELS: BEFORE LOADING ON UNLOADING" "DRIVER TRUST ATTEND WHILE AT ALL TIMES WHILE LOADING ON UNLOADING. "WERE CONFIT FOULDMENT WHEN LIANING ON UNLOADING."	C	DIMMENTS: IT-+47 YUKCA	HASE	AND	11157	»(L	TRUCK	DRIVER WARNING S	16N	S A	7 Sel	user	<u>ຊ</u> ີ
"CHAR WHELS. BEFORE LOADING OR UNLOADING" "DRIVER TRUST ATTEND VEHICLE AT ALL TIMES WHILE LOADING OR UNLOADING. "WERE COLFT FOULDMENT WHEN LADING OR UNLOADING!"	3.	AND ACID FOR ACE	MS.	NIC	n ma	HEE!	WHAL	CHOICE DUNLABLE -	۔ ح	162	5 121	REAL	.ن. و د
" WERD CONFT FOULDMENT WHEN LIANUE OR UNLOADING"	-												
" WERD COLFTY FOULDMENT WHEN LIADING ON WHORDING"		" DRIVER INVST	477	SUP	uch	ile	AT B	LL TIMES WHILE LOAD	SING	ar	vila	PROIN	S
But (1/18)		18 was Calen	دامسک د		ر سی بت	· He	1 /	inc as autopoince	11				
		WEHR SAPET	1 640	pm	avi u	VIJEK	CANO	ing on excending		1311	al	15,	

REMOST-MCKESSON CHEMICAL GROUP

FICKLIST #3 FOR ALL COMPRESSED GAS REPACK FACILITIES

is checklist is to aid in the audit and correction of standards necessary to:

Maintain a safe and healthful workplace.

Comply with applicable governmental regulations.

Pro Poremost-McKesson's image to of Assure quality and diminish liability. Foremost-McKesson's image to our employees, the public, our customers, and our suppliers.

Assure the protection and maintenance of owned and leased equipment, assets and property.

Control losses related to fire, spills, security and liability.

			Stand	lards					Stand	ards	
		Relow	Meets	Exceeds	N/A			Below	Meets	Exceeds	N/A
ION	I. GENERAL RECORDICEPING/TRAINING/	DOCUMEN	TATION								
1.	Tank car disconnected during non-working hours.				V	7.	Disposition of sniff solution in compliance with RCRA.		K		
2.	Compressed gas piping system depressured at night.					8.	Calibrated cylinder used each time before hydrostatic testing and documented.				
	Finished tons/cylinders held for quarantine period (24 hrs.) and valves leak tested before —leasing for shipment.		<u> </u>			9.	Registration of hydrostatic equipment current. a. Last date		<u>/</u>		
4.	as/cylinders determined for destruction immediately segregated, marked; serial numbers and symbols recorded and then obliterated by grinding off.		¥			10.	Employee(s) authorized to perform testing and "new facility manager notifications" are current with DOT.		V		-
5.	Empty containers in sufficient supply.		Y			11.	Compressed gas pamphlets C-1 and C-6 available in supervisor's office.		/		
6.	All sniff solution (including manufacturing of bleach) sampled and tested safely and according to procedures.		√				OILICE.				ç

LOCATION PHOEXIX

INSPECTED BY THAT GOLIET

REVIEWED WITH HIKE BANGO

DATE 2/18/82

		Standards		Standards	
	•	Below Meets Exceeds	N/A	Below Meets Exceeds N/A	
12.	cedure is in compliance with approved written procedure which is accessible to operating employees and periodically reviewed with operators.			e. Each "call-out" properly written up and critiqued. f. Periodic "refresher" training provided. Last date 9/23/8/	
13.	a. Last date reviewed 9/33/8/ No inadvertent gas release since previous audit (if so, detail below).			SECTION II. GENERAL - ALL COMPRESSED GASES - PLANT INSPECTION 1. Empty cylinders awaiting processing	
	a. All releases investigated and preventative action taken.			banded (pallets) or secured. 2. Eye protection worn by operating employees.	
14.	Emergency alarm installed and functioning.			3. "Heavies" set aside for later evacuation and/or testing of contents.	
	Personnel provided with and carry mouth-bit respirators.			4. All evacuated devalved tons/ cylinders inspected internally with a light.	
16.	Chlorep emergency response team:				
	 Personnel identified and trained. 			5. Pressure/vacuum gauge operational at evacuation station(s).	
	 Understand program and responsibilities. 	_ <u> </u>		6. Sniffing/devalving operations safe and deliberate; manual devalving requires non-slip floor and tight wrenches to protect	
	 c. Chlorine emergency equipment readily accessible and maintained. 			from back injury or strains.	
	d. Telephone alert system in effect.	<u> </u>		phere allowed before plugging or valve insertion.	CHEM OF Exhibit I 1/1/82
					10.30 111

_			Stand	lards					Stand	ards	
		Pelow	Meets	Exceeds	N/A			Below	Meets	Exceeds	N/A
	Cylinders are inverted to remove scale, inspect foot rings; bottoms repainted as required.		✓			20.	Forklift and hoist handling of tons/cylinders noted to be deliberate and safe.		Ł		
	<pre># pressure air at valve-repair bench.</pre>		~	,	-	21.	Proper labels are securely attached.			V	
	Each rebuilt valve tested @ 500 PSIG with dry nitrogen.		_			22.	Containers ready to be shipped neat appearing.			~	
	Old valve cleaning solutions discarded properly.		<u>Y</u>			23.	Spraying with solvent based paints indoors done only at spray booth.	<u></u>	Y		
	No backlog of valves requiring rebuilding.		<u> </u>			24.	Area neat; no evidence of corrosion to buildings or equipment.		×		
	New and scrap brass valves properly stored secure from theft.					25.			<u> </u>		
	Cylinders swaiting processing, held for repair or scrap, ready to ship or stored, are properly restrained from falling.		<u>v</u>			26.	or repair are capped, plugged or have a valve inserted to protect interior from corrosion.	_	<u>v</u>		
	/cylinders are properlyured on trucks and trailers in compliance with DOT.		<u> </u>			28.	Ton/cylinders wash or clean out station properly ventilated;				
	No backlog of tons/cylinders requiring testing.		<u> </u>				exhaust system functioning and adequate; wash lances and other equipment in good order.		<u> </u>	************	
	All lines color coded.		V			29.					
	Mechanical equipment appears to be cared for and operating.		_				valves functioning properly; inspections made weekly and documented.				V
	No backlog of cylinders requiring repair.		<u> </u>				Ton/cylinders ready to ship have bornet securely in place with no mis-matched or worn threads. AT UNICLE CITY BLAKEH FOR		\checkmark		

I-27 NO WINDSOK IN PLACE! CONTACT KENWILLS AT UNION CITY BRANCH FOR PRICAMSE PRICE
SUPPLIED INFORMATION BY 3/19/82 - CONTACT REGION OPERATIONS BEFORE PURISHME

			Stand	ards				Stand	ards	
		Pelow	Meets	Exceeds	N/A		Below	Meets	Exceeds	N/A
	III. CHLORINE - PLANT INSPECTION All cylinders are evacuated.		✓			BULK CHLORINE FACILITIES ONLY 1. Tank truck angle valves are				
2.	All ton/cylinder valves replaced each trip with new or rebuilt valves which have been retested.		v			replaced with rebuilt and tested valves once/week or every 5th trip, whichever comes first.		<u> </u>		
3.	Only bronze braid hose or copper tubing used for filling; no crimping of hose or tubing.	-				 Trailers are properly equipped with air pack(s) and chlorine safety kit "C". 		<u> </u>		
4.	Vacuum pulled on container prior to filling.		_		-					
5.	Containers overfilled and sniffed back to net weight per procedure.		_							
6.	Containers properly stenciled "CHLORINE" neatly in 2" letters.		<u>/</u>							
7.	Driers properly functioning; no evidence or report of chlorine entry indicating defective check valves.		<u>Y</u> _							
8.	Only dry air used for padding, clear lines, etc.		<u> </u>							
9.	No discernible chlorine odor indicating leakage.		<u> </u>							

EMERGENCY RESPONSE PLAN SUGGESTIONS

- l. Verify emergency numbers as needed, but at least each six months.
- 2. Conduct drills and review Emergency Response Plan with-branch personnel at least twice a year. - Document.
- Discuss basics of the plan with new employees as they are hired. - Ducument
- When inspections are made by insurance carriers, governmental agencies, fire departments, etc., show them your plan and explain the procedures.
- 5. Any changes (phone numbers, hazardous material additions, structural changes, etc.) send the information to the region so changes can be made in regional copies.
- 6. Designate one specific location within the office to keep the Emergency Response Plan and make certain all employees know where it is.
- 7. Keep thinking of new ideas and procedures we might implement and remember the priorities:
 - Α. Protection of life and limb
 - В.
 - Protection of the environment Protection of facilities and equipment

Home: Phone #

FOLLOWING ARE POINTERS RE: ALL EMERGENCIES

- 1. Remain calm, assess hazard priority and initiate proper emergency response procedure.
- 2. Hope for the best, plan for the worst.
- 3. Our concerns should be as follows:

 - A. Protection of life and limbB. Protection of the environment
 - C. Protection of facilities and equipment

In most cases, immediate response on (C) above will produce the desired results for (A) and (B).

EMERGENCY RESPONSE PROCEDURE

PHOENIX

BRANCH

INDEX

Section	1	Emergency Phone Numbers
Section	2	Emergency Organization
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Section	3B	Plant Layout - Fire Exit/Hoses/ Plugs Location
Section	3C	Plant Layout - First Aid/Safety Kits/ SCBA Locations
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Section	14	Supplier Emergency Phone Numbers

EMERGENCY TELEPHONE NUMBERS

1.	FIRE	931-5600
2.	PARAMEDICS (if different than Fire Dept.)	SAME
3.	POLICE (City or Sheriff)	931 - 5500
4.	POISON CONTROL CENTER	258-5111
5.	AMBULANCE	{2 64 - 2881 263 - 8563
6.	HOSPITAL	848 - 5200
7.	CLINIC (if different from Hospital)	SAME
8.	HIGHWAY PATROL	262-8011
ġ.	RAILROAD	254-1176
10.	F.B.I.	279 - 5511
11.	EMERGENCY COORDINATOR NEVILLE Home: ALTERNATES BANGO "	959 - 2260 849 - 6451 838 - 1221 939 - 7128
12.	REGION OFFICE DDD DNS	(213) 869-2481 222-4101
	B. Westrope (Home) B. Crumm (Home) R. Wagner (Home)	(213) 697-3598 (714) 778-1897 (714) 840-2527

13. If we cannot handle, first call Supplier emergency number (see Section 14), if not available, call CHEMTREC (800) 424-9300.

E M E R G E N C Y O R G A N I Z A T I O N

Emergency Coordinator - J. T. NEVILLE

1st Alternate - HAROLD Gowby

2nd Alternate - AL LEVAN

3rd Alternate - MIKE BANGO

4th Alternate Julius JEFFREY - Home Phone - 247-3398
NON EXEMPT { BOB MITCHELL - " " - 866-1712

Emergency Teams

Fire - M. BANGO, J. SEFFREY, B. MITCHELL

Spills - M. BANGO, B. MITCHELL, J. JEFFREY

Power Failure - H. Gowby, M. Bango

Flood - H. Gowdy, M. BANGO, AL LEVAN

Personal Rescue - M. BANGE, B. MITCHELL, H. GOWDY or injury

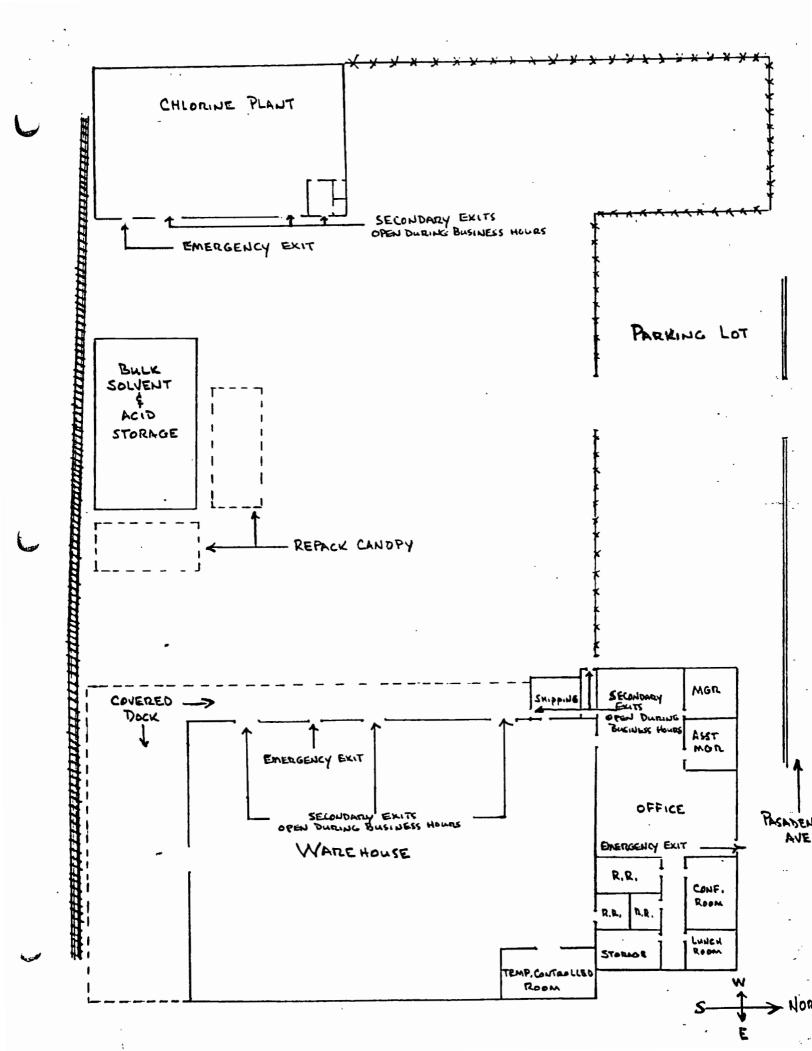
Tornado - H. Gowsy, M. BANGO, AL LEVAN, J. JEFFREY

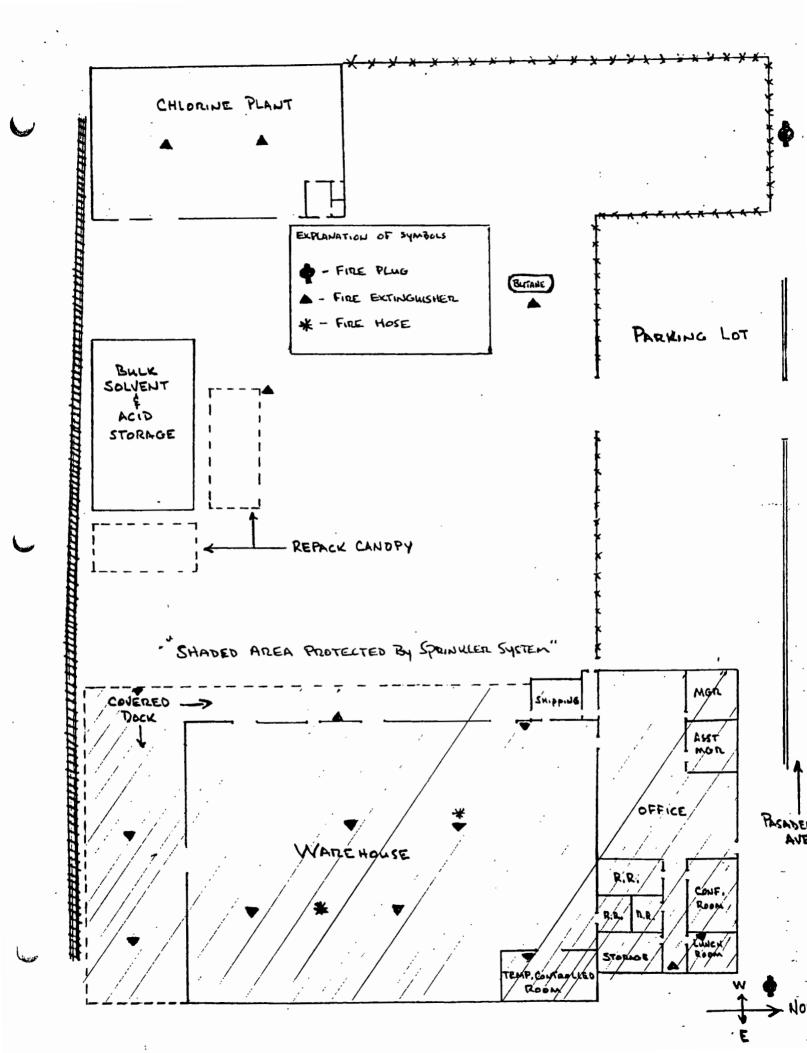
Toxic Gas Release - H. Goway, M. BANGE, BOB MITCHELL On Site

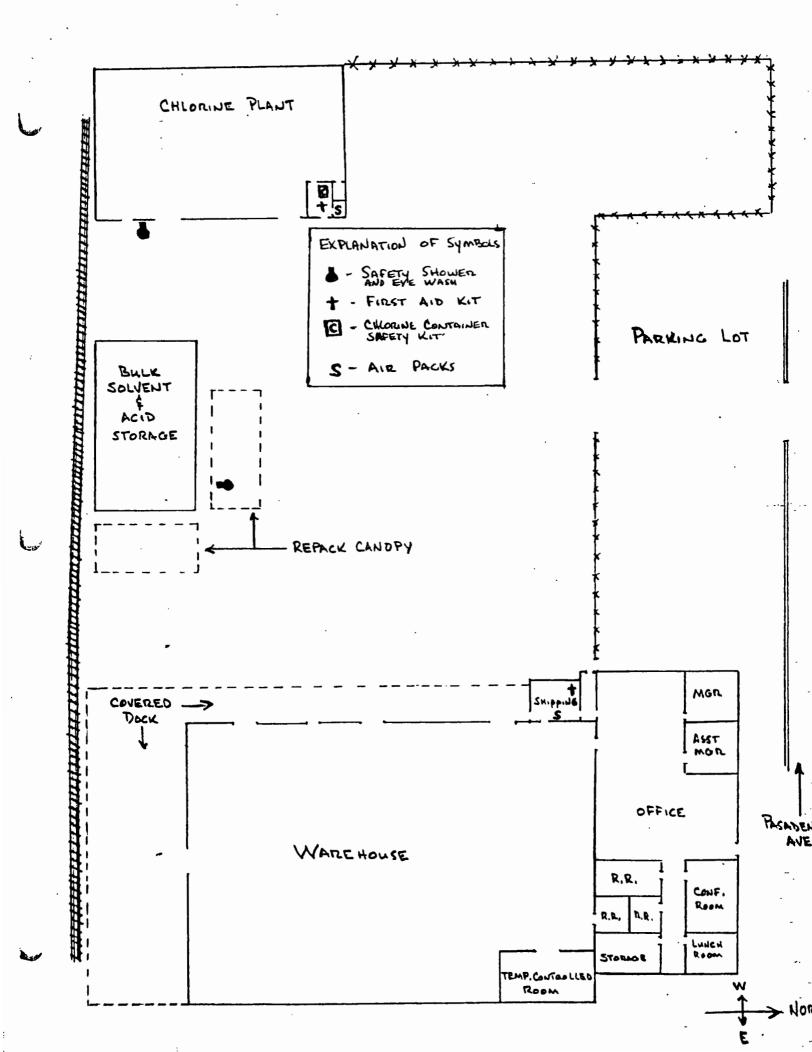
Toxic Gas Release - H. Gowby, M. BANGO, Bog MITCHELL Off Site

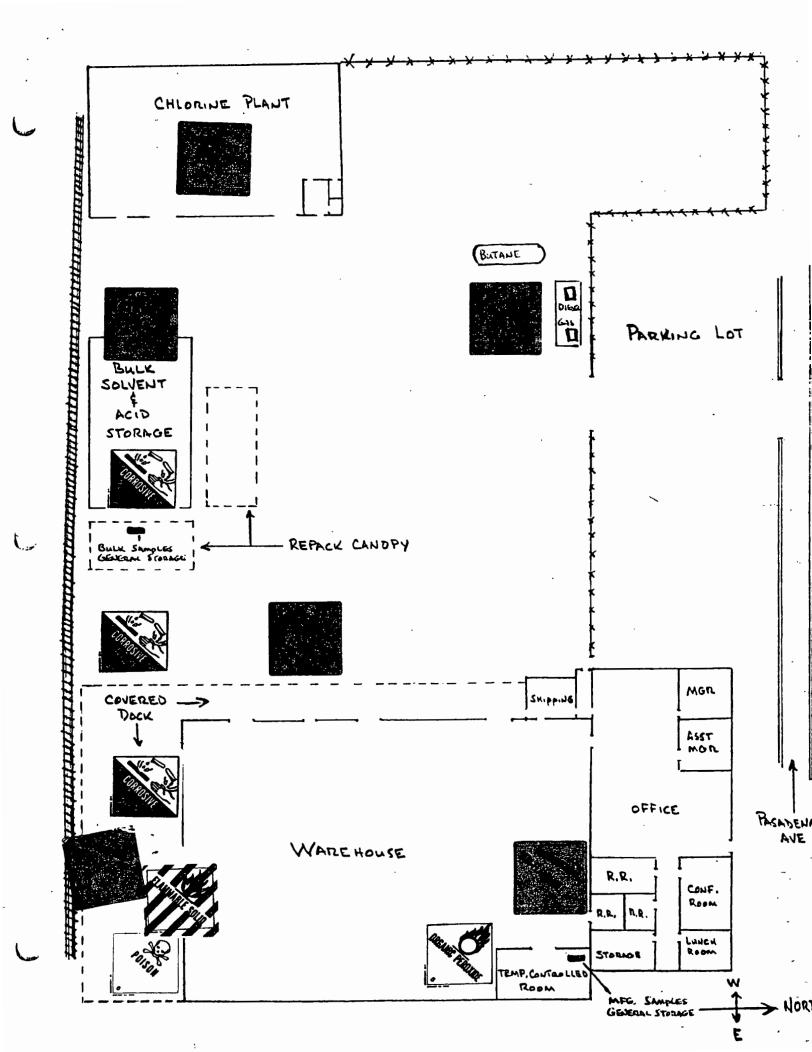
First Aid - BOB MITCHELL, M. BANGO

Bomb Threats - H. Gowdy, M. BANGO, AL 'LEVAN, J. SEFFREY









BOMB THREAT

The Threat

The Telephone call threat. (A high percentage of bombings are preceded by telephone calls.) If you get a bomb threat phone call:

a. If possible, secure the following information (Use check list on attached sheet.)

Date and time of call
Any background noise--music, people talking, etc.
Location of bomb and the time it is set to go off
What kind of bomb
What kind of package
Judge the voice--drugged or drinking, age, sex, etc.
Ask for caller's name and address
(you just might get it)

- b. These questions will detain the caller so a trace can be made. To trace a call, have another employee call the Security Office of the Telephone Co. on a different line. To have a call traced, dial 255-7870/255-6083
- c. Notify the police of the threat. Police dial 931-5500.
- d. Notify Corporate Security (415) 932-5081, Regional Office (213) 869-2481.

The Search Technique

DON'T TOUCH, HANDLE, OR MOVE ANY SUSPICIOUS OBJECT

Make a search for suspicious packages, boxes or objects. Halls and toilets head the list of places. Make the search while waiting for the police to arrive. Have each supervisor and leadman responsible for a certain area. A systematic search will eliminate valuable time loss, awaiting police arrival.

Report the findings for anything suspicious to the police. If anything suspicious is found, set up a "Danger Zone" and evacuate all personnel from this zone (minimum of 300 feet in all directions). Remove flammable materials if practical and possible.

Evacuate building.

DOMB THREAT CHECK LIST

Date . Time .	Your Name
•	•
•	
Listen for background noises	Describe:
Check if heard	•
Music	•
	•
People talking	•
Cars or Trucks	•
Airplane .	•
Children or babies	•
Children of basies	•
Machine noise	•
Typing	•
Other	•
	•
SK ·	
Where is the bomb?	
· · · · · · · · · · · · · · · · · · ·	?
What kind of bomb is it?	
-	
	,

CHEMICAL SPILLS

-	
In Corrosive Dike Area	1. Contain
	2. Neutralize
	3. Remove
In Solvent Dike Area Non-Flammable	l. Contain
Non Tanunable	Large - pump out for recovery and disposal
	 Small - Absorb with absorbant clay and dispose
In Corrosive Repack Building	Flush with water into Neutralization pits
Outșide Yard Area Corrosives	<pre>l. Build dam with lime and/ or soda ash</pre>
	2. Neutralize
	3. Remove
Flammable Solvents	Activate alarm
•	Call fire department
	Turn off all power units
	Do not allow product to enter sewer
	Build dam with oil absorbant

Emergency team advise if plant shall be evacuated

FIRE

Person discovering fire will: Activate alarm

Use fire extinguisher until

help arrives

Office personnel will call: Fire Department

Emergency Coordinator or

Alternate

Alert Police Department

Railroad (if cars on track, advise them of materials)

Fire Emergency team will: Assess extent of fire and

potential nature of fire

Extinguish fire

Shut down main power supply

Emergency Coordinator: Order evacuation of plant

Take head count

Coordinate and cooperate with

Fire Department

The Fire Brigade (Emergency Team) should be instructed in at least the following procedures wherever they apply:

- A. The means of summoning the fire department immediately in an emergency.
- B. Directing personnel safely and quickly from the premises.
- C. Use of hand extinguishers and hose lines on small fires and mop-up operations. Localize any fires, if possible, to prevent water damage from sprinklers.
- D. Operation of sprinkler systems and water supply equipment.
- E. Use of material handling equipment while sprinklers are still operating to effect final extinguishment.
- F. Maintaining the security of the premises, closing all doors, and directing firemen to the exact location of the emergency.
- G. The supervision of sprinkler control valves to be sure they are completely open and remain so until otherwise directed by the fire department.
- H. Emergency shutdown and safeguarding of electrical, gas, steam and flammable liquid equipment.
- I. Proper salvage procedures of stock and equipment.

These procedures and duties should be posted in promiment locations in the plant. Records should be kept of drills held and changes made in the brigade operation and organization.

EVACUATION PLAN

(FIRE - FLOOD - BOMB THREAT - TOXIC GAS RELEASE)

- 1. Emergency Coordinator or Alternate will order the evacuation.
- 2. Assembly point for personnel:

NORTH WEST CORNER OF OUR PARKING LOT

3. Forklift, truck rendezvous point:

FORLLIFTS - SOUTHWEST

CORNER OF OUR PARKING LOT

"TRUCKS" - NORTH SIDE

OF PASADENA AVE, 100 FEET EAST OF PLANT.

- 4. Trucks to be evacuated on the following priority basis:
 - a. Loaded with hazardous materials on load
 - b. Loaded with no hazardous material on load
 - c. Empty

Cooperate and coordinate with Fire and Police Department personnel.

TOXIC GAS RELEASE

- 1. Activate alarm
- 2. Emergency team stop product release (if possible)
- 3. Call Fire Department, Police Department
- 4. Emergency Coordinator determine if evacuation required
- 5. If release cannot be stopped immediately, notify neighbors (see Neighborhood Alert) down wind first. Ask Fire Department and Police assistance.

POWER FAILURE

- 1. Check emergency lights, office and warehouse.
- 2. One person on watch in each area.
- 3. Notify Fire Department if phones are inoperative, send someone to advise Fire Department. Location of nearest Fire Station serving our facility is:

GLENDALE	FIRE	DEP'T.
7505 NORTH	55 TH	AUE.
GLENDALE		

- 4. Post lookouts in each area to report in event of fire.
- 5. In the event of fire proceed with "Fire Plan."

NEIGHBORHOOD A LERT

- 4. GEOGIA PACIFIC PH # 939 1413
- 3. FIBREBOARD Coap. PH# 439-9401
- 2. GENERAL ELECTRIC-PHA 939-3391
- 1. STRONG NEWS PH# 939-6511

DAY - 937-2

1. COOPER TOUCKING - PH NIGHT-978-2

2. RENCO. DONG - PH 934-7221

3. LEGGET & PLATT - PH 931-5336

4. FITZ PATRICK CONST - PH 937-4711

DAY - 937-2

1. COOPER TOUCKING - PH 939-0647

2. HADLEY AUTO TIZANK-PH 939-0647

3. LEGGET & PLATT - PH 931-5336

4. U-HAUL Co. - PH 263-6521

S. CALCOT LIMITED - PH 937-4711

- 1. R. WEST FUNITURE PH & 846-7757
- 2. Kunts TEXACO PH 4 846-7773
- 3. POLLAROS ARCO PH# 846-7784
- 4. CROWN ZELLERBACH PH* 939 7519

TORNADO

While driving in town - seek shelter immediately in a nearby building preferably a steel framed or reinforced concrete building of substantial construction--stay away from windows. Go to the lowest floors or go to basement if one is available. Do not remain in automobile or truck.

In office - stand in an interior hallway or office away from windows. Avoid flying glass.

In warehouse - post a lookout--workers should move quickly to the section of the plant offering the most protection.

Leave doors and windows open. Follow Fire and Emergency Plan.

KEEP LISTENING

KEEP LISTENING

KEEP LISTENING

YOUR RADIO-TELEVISION STATIONS WILL BROADCAST THE LATEST TORNADO ADVISORIES.

Fire

If possible to move trucks to an isolated spot without jeopardy to the driver, do so before taking further action.

- a. If fire in truck components, such as brakes, engine or electrical system, try to extinguish.
- b. If fire in cargo, an attempt to extinguish with extinguisher suggested if not out of control and where it can be reached. (Do not enter vans without assistance and protective equipment.)
- c. Combustion of products arising out of major fire of truck's contents such as (1) toxic spillage or (2) fumes or dust. In this case, among the first things to do is to note whether there are homes, offices or factories nearby and what is the direction of the prevailing wind. Is the wind dispersing fumes or combustion products toward houses, offices or factories? If so, get word to them of what is occurring; if masks are needed, that fact should be transmitted to the branch and emergency agency.
- d. Ask for help from spectators to call Fire Department and move spectators back.
- e. Set out flares or have someone assist to divert traffic. In case of heavy flammable spill or oxidizer cargo where concern for a major conflagration or explosion may occur, attempt to clear adjacent buildings.
- f. As with spills below, if unable to contain, alert spectators and Fire Department.

TRUCK EMERGENCIES (CONT'D)

Spills

- a. Contain or dike with an inert material if possible
- b. Ask for help from spectators or anyone assisting him to call Fire Department.
- c. Move spectators back away from area. Divert foot and auto traffic.
- d. If liquid is flammable, turn off ignition and divert traffic.
- e. No smoking. Be alert for other ignition sources.
- f. If liquid is toxic or corrosive, advise spectators and Fire Department.
- g. Expand all effort in protecting people.
- h. Ask for help to evacuate business and homes if necessary.
- i. Call Fire Department, Emergency Coordinator.

BE CALM - ASSESS PRIORITY HAZARD - KNOW YOUR PRODUCT

TOXIC GAS RELEASE - OFF SITE

ASSUMES NOTIFICATION VIA TELEPHONE

- 1. Emergency Response Coordinator obtain all pertinent information, i.e. name of person calling, location, extent of release, whether fire department has been notified and nature of assistance required. You should also indicate the time of day that you received the call.
- Remain calm, offer advice over phone (refer to Chem Card Manual if unsure).
- 3. Activate and dispatch, as necessary, the Emergency Response Team for off site toxic gas release. Record when the team was dispatched.

The Off Site Toxic Gas Release Emergency Response Team should consist of exempt (non-hourly) personnel only. No less than two persons should be dispatched on an emergency. They are to be fully qualified (documented) in the use of chlorine safety kits and self-contained breathing apparatus.

Allied Chemical Specialty Division 1701 East Woodfield Road Schaumberg, IL 60172 *201-455-2000

*If this system should fail, the following is a list of Product Managers and their phone numbers.

Adipic Acid Cyclohexanone Cyclohexanol Ammonium Sulfate

Joe Haddad Hopewell Chemicals 201-455-3039 Frank Piguet Plant Manager 804-458-7811

Cumene Hydroperoxide Phenol

Charlie Davidson Frankford Chemicals 201-455-2587 Maury Hunt Plant Manager 215-533-3000

Malic Acid

Steve Parker Moundsville Chemicals 201-455-2325 James Muthig Plant Manager 304-845-5670

UFC-85 Ammoniacal Liquor

Paul Alix South Point Chemical 201-455-5245 Doug Connor Plant: Manager 614-377-4321

Wally Giordano Western Regional Sales Manager

Business: Home: 312-884-4869 312-690-0640

Allied Chemical Industrial Chemicals Div. 100 Pine Street San Francisco, CA 94111 Chemtrec 800-424-9300

Allied Chemicals Agricultural Division La Prade Street-Westover Site P.O. Box 131 Hopewell, VA 23860 804-458-7811

American Cyanamid Company P.O. Box 66189 Chicago, IL 60666 201-835-3100

The Ansul Company Marinette, WI 54143 715-735-7411

Carus Chemical Company 1375 Eighth Street La Salle, IL 61301

*815-223-1500 *800-435-6856

*During the hours of 8:00AM to 5:00PM on a normal working day (central time). When operator answers, let her know you are calling for emergency information on CAIROX you will be transferred to Horst Adolf, Chief Chemist.

After normal working hours call the Foreman

815-223-1523

or

Horst Adolf (Home Tel.)
Jack Doyle (Home Tel.)

815-223-5187

815-223-5987

Chemtrach Industries, Inc. 9909 Clayton Road St. Louis, MO 63124 Chemtrec 1- 800-424-9300

Diamond Shamrock Corporation 617 Veterans Boulevard Suite 205 Redwood City, CA 94063 Chemtrec 800-424-9300

E. I. DuPont de Nemours Wilmington, Delware 19898

302-774-7500

Transportation Emergency

Chemtrec 800-424-9300

Plant Emergency

302-774-2421

Escambia Chemical Division Air Products and Chemicals, Inc. P.O. Box 467 Pensacola, FL 32502 *****800-523-93**7**4

Except Pennsylvania (For call originating in Pennsylvania) 800-322-9092

FMC Corporation Industrial Chemical Group 8787 Enterprise Drive Box 344 Newark, CA 94560		215-299-5800
Georgia-Pacific Corporation 100 N. Citrus Avenue, Suite 445 West Covina, CA 91791	Chemtrec	800-424-9300
The Harshaw Chemical Company Division of Kewanee Oil Company 10016 Pioneer Boulevard, Suite 212 Sant Fe Springs, CA 90670	Chemtrec	800-424-9300
IMC Chemical Group, Inc. 2000 Prudential Tower Boston, MA 02199	Chemtrec	800-424-9300
Kerr-McGee Chemical Corporation Kerr-McGee Center _ Oklahoma City, OK 73125		405-270-1313
Monsanto Industrial Chemicals Company 800 N. Londbergh Boulevard St. Louis, MD 63166	NATIONWIDE	314-694-1.000
Noury Chemical Corporation 2153 Lockport-Olcott Road Burt, NY 14028		71.6778-8554
Olin Chemicals Group 120 Long Ridge Road Stamford, CT 06904		203-356-2345
PPG Industries, Inc. 1860 El Camino Real, Suite 305 Burlingame, CA 94010	NATIONWIDE	412-434-3131
Transportation Emergency	Chemtrec	800-424-9300

Rohm and Haas Company Independence Mall West Philadelphia, PA 19105 21.5-592-3000

Union Carbide Corporation Chemicals and Plastics 100 Oceangate Long Beach, CA 90802 304-744-3487

Union Oil Company of California Union Oil Center, Box 60455 Los Angeles, CA 90060 714-529-6671

Vulcan Materials Company P. O. Box 7689 Birmingham, AL 35223 316-524-5751



DOW CREMICAL DISTRIBUTION EMERGENCY RESPONSE SYSTEM

THONE NUMBERS

LOUISIANA

504-687-4321 EX. 500

MIDLAND

517-636-4400

TEXAS

713-238-2112

WESTERIA -

415-432-7311

DOY:-CAHADA

519-339-3711

FOR KOK-DOW PRODUCTS USE

CHEMTREC

600-424-9300

SHELL CHEMICAL (113) 473-9461

EMERGENCY PHONE NUMBERS FOR POWER OUTAGE OR TROUBLE

ELECTRIC

SALT RIVER PROJECT - 273-8811

NATURAL GAS

ARIZONA PUBLIC SERVICE - 258-8711

271-7171

WATER

City of GLENDALE - 931 - 5686

931-5563 AFTER 5:00



EMERICA ESPECIALISM PARTIES

8, F, Bouldin

1. INTRODUCTION

The purpose for this review is to learn how to deal with emergencies that way occur in the rectine handling of chlorine gas. We will begin by observing the properties of this gas and their potential hazard when there is exposure of people in the area of a chlorine leak. Suggestions will be made as to the proper sequence of steps to take when dealing with an emergency. Further, suggestions will also be made for alternate procedures in the event proper equipment is not on hand. However, it must be stressed that there is no substitute for trained people, properly equiped, and a plan of emergency procedure. It must be remembered at all times that chlorine is a multi-purpose friend of man, but also is a hazardous gas that must be treated with respect.

2. PROPERTIES AND HAZARDS OF CHLORINE

PROPERTIES The properties of chlorine important to us here are:

(a) A greenish yellow lethal gas.

(b) It is 2 1/2 times heavier than air.

- (c) Only slightly soluble in water, less then 1/2 of 1%.
- (d) While it is non-flammable it will support combustion.

(e) It is non-explosive.

- Chlorine is non-conductive electrically.
- (g) It is corrosive in the presence of moisture.

(h) The gas has a pungent and irritating odor.

(i) The container pressure varies with temperature.

HEALTH HAZARDS FROM EXPOSURE

- (a) The respiratory system is vulnerable.
- (b) Inhaling excessive amounts can be fatel.

(c) Eyes and skin are easily irritated.

- (d) The gas hazard is not cumulative. It is detectable at 3ppm, and exposure can be minimized by simple detection.
- (e) Damage is not permanent if exposure is moderate.

Knowledge of the properties and hazards of this gar can lead to a much more professional approach when dealing with emergencies. As an example, it is obvious the chlorine room should be vented near the floor since the gas is 2 1/2 times heavier than air and will fall. Since chlorine is only slightly soluble in water, you wouldn't throw a leaking cylinder into water hoping the gas would be absorbed. From a health hazard standpoint, you would certainly protect the lungs from heavy concentrations since the respiratory system is highly vulnerable. These are important facts for any training program.

3. RULES FOR SAFE HAROLING

As with any product requiring safe handling procedures, there are certain "Dots" and "Don'ts" and chlorine is no exception. Careful attention should be given to the following list.

MINGS TO DO:

- (a) Do use the proper chlorine wrench on the valve stem.
- (b) Always use new gaskets when making connections.
- (c) Do-ventilate the chloring room (near the floor).
- (e) Do learn emergency procedures.
- (f) Always open a cylinder or ton container valve one full turn. It is not good practice to control flow here.
- (g) Roll a leaking cylinder or ton container so that the leak is up and emits gas not liquid.
 - (h) Always check a new connection with ammonia for leaks.
 - (i) Own and learn to use Chlorine Institute Emergency Kit A, Kit B, and Kit C.
 - (j) Set up an emergency procedure plan and training program.

THINGS NOT TO DO

- (a) Do not heat cylinders or ton containers.
- (b) Never put water on leaks.
- (c) Do not try to air pad ton containers.
- (d) Do not immerse cylinders in water.
- (e) Do not store your chlorine mask or safety equipment in the chlorine room.
- (f) Do not use rubber hose for chlorine lines.
- (q) Never use pipe wrenches on chlorine valve stems.
- (h) Avoid changing chlorine tanks when alone.
- (i) Do not run chlorine lines through hot then cold temperature zones as condensation may occur.

Many of the problems that arise with chlorine handling could be avoided by adhering to the principles laid down in these two lists.

4. PREPARATION FOR EMERGENCIES

The time to prepare for any emergency is always well before it happens. This section deals with suggestions for accomplishing this very purpose:

- (a) Write out an emergency plan and give to your people.
- (b) Start your plan with the assignment of specific individual responsibilities.
- (c) Designate some one to be responsible for checking and keeping up mask and safety equipment. Check dates on cannisters.
- (d) Make a list of phone numbers that will be available to plant people as to who they should contact in the event of an emergency in the night or off-hours.
- (e) A training program should be implemented as quickly as possible to instruct your people in their assigned responsibilities on how to deal safely with a chlorine leak. People wearing the right mask have been seriously hurt because they were ill trained in how to wear it properly and insure an air-tight fit.
- (f) Emergency kits should be owned and individuals trained in how to apply them. We recommend every repackaging plant have an Emergency Kit C for tank cars.
- (g) All equipment should be kept up to date and stored in a convenient place adjacent to, but not in the room of chlorine usage. Locking up the emergency equipment might protect it from theft, but it could also be disastrous—in the event the equipment is inaccessible at the time of an emergency. Emergency equipment can and has been locked up at the time an emergency occurred.

(h) First aid training is a must. A life may be saved by this knowledge. Continual training in this and other emergency procedures is necessary because personnel change jobs or are moved to other capacities in the company.

5. RESPIRATORS

Attacking any chlorine emergency situation begins with selecting the proper gas mask ans wearing it correctly. There are several types of masks available and many chlorine users and repackers own several kinds. Each mask has its own advantages and limitations. The cost of each varies, and this may dictate, in many instances, why a company owns the type it does. On the other hand, safety must never be sacrificed for economy. Your local Fire Department should be equipped with excellent mask equipment and their phone number should be readily available.

If several types of masks are available, an attempt may be made to make a judgement selection at the time of an emergency as to which mask to use. We recommend you always use the compressed air mask if one is owne. The canister type is best suited to an outdoors situation when atmospheric dilution lessens the chlorine concentration.

Operating personnel should attach to their clothing an escape respirator to leave the plant area in case of a sudden chlorine release.

TYPES

- (a) Self-contained breathing apparatus for use above 1% chlorine concentrations such as:
 - (1) Compressed air cylinder type, such as Scott, MSA, Survivair
 - (2) Oxygen cylinder type, such as MSA
 - (3) Oxygen generating type, such as MSA Chamox
- (b) Canister Type gas masks for use below 1% chlorine.
- (c) All respirators should be Bureau of Mines approved.

LIMITATIONS

- (a) Self-contained: Time Limit
 - (1) Scott 1/2 Hr. -- Survivair also has a larger 50 minute apparatus
 - (2) MSA 1/2 Hr.
 - (3) Chemox 3/4 Hr.
- (b) Canister: 1% Maximum Chlorine concentration 15 Min. to 1 hour exposure

STORAGE AND CARE

- (a) Never store in chlorine room or use area.
- (b) Discard canister after tape is removed from bottom regardless of use. It loses chlorine absorptive capacity.
- (c) Acquaint all personnel with musk locations and how to use.
- (d) Store in cool, dry place.
- (e) Inspect periodically for hose deterioration.
- (f) Always check for air-tight fit around face piece when in use.

FIRE DEPARTMENT BACK UP

- (a) Include the Fire Department in your emergency plans. They fare usually prepared with self-contained breathing apparatus.
- (b) Ask if they are knowledgeable about chlorine emergencies and acquaint them with your usage.

6. EMERGENCY PROCEDURES

GENERAL

Each emergency may vary in its circumstances, but the same principles will apply in your approach to the problem. Injury to people is always the element of greatest concern and therefore our list of things to do begins with the evacuation of people in the immediate area. If the gas leakage is of large proportions, people may have to be moved from nearby premises. This list is suggested as a general guide as individual circumstances may dictate deviation. However, in general these are believed to be the basic steps that should be followed in handling a routine chlorine leak:

- (a) Evacuate personnel from the area.
- (b) Render first aid.
- (c) Put on an approved gas mask and check for fit.
- (d) Locate leak with ammonia soaked rag.
- (e) Shut off valve at chloring sources.
- (f) Position container to emit gas and not liquid...
- (g) Tighten thread fittings if this is source of leak.
- (h) Apply proper emergency kit device if available.
- (i) Disconnect container and remove from service.
- (j) If help is neede, cell the supplier.

EMERGENCY KITS

Chlorine Institute Emergency Kits, A, B, and C, cover most of the problems that will arise with leaking chlorine containers. The Emergency Kit A will seal various leaks on cylinders. The B Kit; will serve well in capping off leaks that might occur in ton containers. The C Kit is specifically designed for tank cars and tank trucks.

OTHER MEASURES

Alternate measures may be tried in the event proper equipment is not available. These are less desirable but may be practiced as an emergency measure.

Leaks occurring in cylinder valves may be slowed considerably by jamming a sack of lime onto the cylinder valve. Lime will absorb chlorine, but only to its saturation point. This will not stop the leak but will buy valuable time for removing the cylinder to a safdr area for reaching your safety equipment.

Cylinders and ton containers may be put in dry ice and covered with plastic sheet to drop the temperature and reduce cylinder pressure to a point where the leak may stop. A lime slurry with water may also be used to bleed the leaking cylinder into and thus absorb its chlorine capacity. Approximately

188# of lime is required to empty a 150% cylinder and 2500% of lime to absorb a ton container. Soda Ash may be used and require 450% to absorb a 150% cylinder or 6000% to absorb a ton container. If Caustic Soda is available, 188# will absorb 150% cylinder and 2500% will, absorb a 2000% container. It is hoped that these additional measures may provide yet another safety valve for dealing with escaping gas, but emergency kits are by far the safest means.

Naturally emergencies are something we would like to avoid. However, they do occur and we trust you will be prepared. Report all emergencies you have to the Chlorine Institute.

7. FIRST AID

The Institute's Environmental Health Committee has developed the following first aid data sheet. Modern methods of artificial respiration should be mastered. The mouth-to-mouth method is preferred and will not affect the person giving respiration. Again training must be stressed as the key to the proper knowledge of rendering first aid.

FIRST AID DATA SHEET FOR CHLORINE EXPOSURE

1.GENERAL

- Be cautious do not become a casualty yourself
- Prompt treatment is essential
- Immediately remove exposed person to an uncontaminated area
- Never give anything by mouth to an unconscious patient
 - Call a physician

2. CHLORINE GAS INHALATION

If Breathing Has Coased

- Commence artificial respiration immediately
- If available administer oxygen

If Breathing Has Not Ceased

- .- Place patient in a comfortable position
 - Administer oxygen if available
 - Keep patient warm and at rest in a comfortable position
 - Render any other necessary first aid

3. LIQUID CHLORINE EYE CONTACT

- Flush eye immediately with copious amounts of running water 15 minutes
- Forcibly hold eyelids apart to ensure complete irrigation of all eye and lid tissues
- Hever attempt chemical neutralization

4. LIQUID CHLORINE SKIN CONTACT

- Emergency shower removing clothes in shower

- Wash well with copious amounts of soap and water
- Apply no greases unless ordered by a physician

8. CONCLUSION

Chlorine emergency planning may be summarized as follows:

- (a) Learn the properties and hazards of chlorine gas
- (b) Know the rules for safe-handling chlorine
- (c) Prepare for emergencies by training and planning
- (d) Understand the gas mask and its limitations
- (e) Master the emergency procedure and emergency kits
- (f) Have alternate measures as a back up
- (g) Be prepared for first aid and rescue operations

Chlorine is a work horse for mankind. However, nearly every element has a side to its character that must be controlled with knowledge and respect. Chlorine is certainly no exception. It is no respecter of persons. Preparations must be made for handling emergencies.